

EXHIBIT 2

Transaction Date	Attorney	Time Spent	Billing Status	Description
12/15/2015	Seth Packrone	0:06:00	Billable	Correspond with Rebecca Livingood from ACLU NJ to set up time to speak about education for juveniles with disabilities in juvenile and adult facilities
12/16/2015	Seth Packrone	0:18:00	Billable	Correspond with M. Smith re: further contacts about NJ prison system
12/16/2015	Seth Packrone	0:06:00	Billable	Correspond with impacted organization re: setting up a time to meet
12/17/2015	Seth Packrone	0:06:00	Billable	Strategy session re: next steps for investigation in NJ with M. Caiola
12/18/2015	Seth Packrone	0:06:00	Billable	Schedule meeting with Director of impacted organization
12/18/2015	Seth Packrone	0:06:00	Billable	Follow up and prepare for call with Rebecca Livingood from ACLU NJ
12/18/2015	Seth Packrone	0:42:00	Billable	Teleconference with Rebecca Livingood from ACLU NJ re: juveniles in adult prison receiving special education services
12/18/2015	Seth Packrone	0:30:00	Billable	Summarize and analyze notes from Rebecca Livingood call for M. Smith
12/18/2015	Seth Packrone	0:12:00	Billable	Strategy session with M. Caiola re: NJ investigation
12/21/2015	Seth Packrone	0:18:00	Billable	Correspond with Rebecca Livingood re: litigation strategy and juvenile public defender
12/22/2015	Seth Packrone	0:06:00	Billable	Prepare for call with Director of impacted organization
12/22/2015	Seth Packrone	0:30:00	Billable	Teleconference with Director of impacted organization
12/22/2015	Seth Packrone	0:06:00	Billable	Review and analyze materials from impacted organization
12/23/2015	Seth Packrone	0:30:00	Billable	Summarize and enter notes from call with Rebecca Livingood into issue memo
12/23/2015	Seth Packrone	0:30:00	Billable	Summarize and enter notes from call with impacted organization into ongoing issue memo
1/4/2016	Michelle Caiola	0:12:00	Billable	update from SP re special education meetings with NJ groups and next steps
1/4/2016	Seth Packrone	0:12:00	Billable	Strategy session with M. Caiola re: next steps in investigation
1/4/2016	Seth Packrone	0:12:00	Billable	Correspond and send updated special education documents to M. Smith to set up conference to discuss next steps
1/5/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: discussing next steps in investigation
1/8/2016	Mary-Lee Smith	0:30:00	Billable	Work session with S.Packrone re possibility of DOC issue for youth
1/8/2016	Seth Packrone	0:18:00	Billable	Review notes on NJ state prison and prepare for call with M. Smith re: next steps in prison investigation
1/8/2016	Seth Packrone	0:30:00	Billable	Teleconference with M. Smith re: next steps in prison investigation
1/8/2016	Seth Packrone	0:12:00	Billable	Strategy session with M. Caiola re: next steps in investigation
1/11/2016	Mary-Lee Smith	0:30:00	Billable	Email exchange w/ S.Packrone re next steps re NJ prison investigation; instructions re potential co-counsel and impacted organization
1/11/2016	Seth Packrone	0:18:00	Billable	Background research and compile information on impacted organization
1/11/2016	Seth Packrone	0:06:00	Billable	Draft litigation plan for week for investigation next steps
1/11/2016	Seth Packrone	0:36:00	Billable	Read and take notes on impacted organization's relevant data collection
1/11/2016	Seth Packrone	0:06:00	Billable	Read and take notes on NJ Bill to Reform Waiver System for juveniles
1/11/2016	Seth Packrone	0:06:00	Billable	Review and take notes on intake form for relevant organization's outreach to potential class members
1/11/2016	Seth Packrone	0:36:00	Billable	Draft and send investigation next steps to M. Smith
1/11/2016	Seth Packrone	0:06:00	Billable	Correspond with Director of impacted organization re: meeting to discuss juveniles in NJ adult facilities
1/12/2016	Mary-Lee Smith	0:18:00	Billable	Call with S.Packrone re NJ prison investigation and potential co-counsel
1/12/2016	Michelle Caiola	0:18:00	Billable	T/C with MLK and SP re next steps on investigation
1/12/2016	Michelle Caiola	0:06:00	Billable	follow up check in with SP re next steps
1/12/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: next steps in prison investigation
1/13/2016	Seth Packrone	0:24:00	Billable	Draft responses to Rebecca Livingood and Kathy Wright and send to M. Smith
1/15/2016	Seth Packrone	0:06:00	Billable	Correspond with Rebecca Livingood from ACLU NJ re: time to meet with impacted organization
1/20/2016	Seth Packrone	0:12:00	Billable	Teleconference with Rebecca Livingood re: meeting with impacted organization and represent students in due process hearings in prison

1/20/2016	Seth Packrone	0:12:00	Billable	Review and analyze NJ special education law and guidelines
1/20/2016	Seth Packrone	0:06:00	Billable	Build timeline for investigation and next steps
1/22/2016	Michelle Caiola	0:06:00	Billable	Update from SP re next steps for investigation
1/22/2016	Seth Packrone	0:18:00	Billable	Follow up with ACLU-NJ re: potential client and co-counsel agreement
1/26/2016	Seth Packrone	0:12:00	Billable	Correspond with Rebecca Livengood from ACLU NJ re: meeting with impacted organization
1/26/2016	Seth Packrone	0:06:00	Billable	Confirm meeting with impacted organization tomorrow
1/26/2016	Seth Packrone	0:42:00	Billable	Review documents on NJ special education and prepare agenda for tomorrow's meeting with ACLU-NJ and impacted organization
1/26/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: agenda for tomorrow's meeting with ACLU-NJ and impacted organization
1/27/2016	Michelle Caiola	0:06:00	Billable	discuss agenda for ACLU/impacted group meeting
1/27/2016	Seth Packrone	0:24:00	Billable	Review documents on impacted organization's relevant data and prepare for meeting with ACLU-NJ and impacted organization
1/27/2016	Seth Packrone	0:06:00	Billable	Strategy session with M. Caiola re: plan for meeting with ACLU-NJ and impacted organization
1/27/2016	Seth Packrone	0:30:00	Billable	Travel to and from impacted group's offices in Elizabeth, NJ (total travel time was 1 hour)
1/27/2016	Seth Packrone	3:00:00	Billable	Meeting with Rebecca Livengood from ACLU-NJ and Director of impacted organization re: investigation next steps
1/27/2016	Seth Packrone	0:12:00	Billable	Update M. Smith re: meeting with impacted organization and ACLU-NJ
1/28/2016	Michelle Caiola	0:24:00	Billable	t/c with SP re post ACLU and impacted organization meeting and end results
1/28/2016	Seth Packrone	0:06:00	Billable	Check in with M. Smith re: update on ACLU-NJ and impacted organization meeting
1/28/2016	Seth Packrone	0:24:00	Billable	Strategy session with M. Caiola re: next steps for investigation and impacted organization
1/29/2016	Seth Packrone	0:18:00	Billable	Correspond with impacted organization representative about potential intakes for NJ prisons case
2/2/2016	Seth Packrone	0:06:00	Billable	Strategy session with M. Caiola re: next steps for impacted organization
2/2/2016	Seth Packrone	0:12:00	Billable	Follow up with impacted organization re: information about members with special needs in prison
2/2/2016	Seth Packrone	0:06:00	Billable	Review and analyze information about impacted organization's members in prison
2/2/2016	Seth Packrone	0:06:00	Billable	Review and analyze NJ state special education law
2/3/2016	Seth Packrone	0:12:00	Billable	Teleconference with C. Molholm re: requirements for representing students at due process hearings in NJ
2/3/2016	Seth Packrone	0:06:00	Billable	Give directions to C. Molholm re: research question about due process hearings in NJ
2/3/2016	Seth Packrone	0:06:00	Billable	Strategy session with M. Caiola re: representing youths with disabilities in prison involved with impacted organization
2/3/2016	Seth Packrone	0:06:00	Billable	Correspond with impacted organization re: representing students with disabilities in prison in due process hearing
2/3/2016	Seth Packrone	0:12:00	Billable	Review and analyze documents on requirements for representing students with disabilities in due process hearings in NJ
2/3/2016	Seth Packrone	0:06:00	Billable	Give directions to C. Molholm re: further research on due process hearings in NJ
2/4/2016	Seth Packrone	0:18:00	Billable	Analyze and take notes on legal claims in Contra Costa case to update ACLU's litigation strategy
2/4/2016	Seth Packrone	0:06:00	Billable	Correspond with C. Molholm re: NJ law around representation in a due process hearing
2/5/2016	Seth Packrone	0:06:00	Billable	Strategy session with S. Seaborn re: exhausting administrative remedies in NJ investigation
2/5/2016	Seth Packrone	0:12:00	Billable	Send ACLU-NJ litigation strategy memo to M. Smith and update her on strategy
2/8/2016	Mary-Lee Smith	0:30:00	Billable	Work session w/ S. Packrone re intake and PLRA
2/8/2016	Seth Packrone	0:12:00	Billable	Correspond with Kathy Wright re: intake's history of disability status
2/8/2016	Seth Packrone	0:30:00	Billable	Summarize and analyze notes from meeting with -NJ and impacted organization
2/8/2016	Seth Packrone	0:24:00	Billable	Teleconference with impacted organization's potential client's education records
2/8/2016	Seth Packrone	0:06:00	Billable	Correspond with C. Molholm re: NJ law around special education due process hearings
2/8/2016	Seth Packrone	0:18:00	Billable	Teleconference with impacted organization re: follow up on potential client's education records
2/8/2016	Seth Packrone	0:18:00	Billable	Update M. Smith re: investigation next steps and intakes

2/8/2016	Seth Packrone	0:12:00	Billable	Review and analyze potential client's records from NJPC
2/8/2016	Seth Packrone	0:30:00	Billable	Conference with M. Smith re: next steps for prison investigation and PLRA
2/8/2016	Seth Packrone	0:06:00	Billable	Give directions to C. Molholm re: research on NJ special education law
2/8/2016	Seth Packrone	0:06:00	Billable	Review and analyze NJ law on Pro hac vice
2/9/2016	Seth Packrone	0:06:00	Billable	Review and analyze prison visitation rules at DOC facility
2/9/2016	Seth Packrone	0:06:00	Billable	Review and analyze NJ pro hac vice rules
2/9/2016	Seth Packrone	0:06:00	Billable	Give directions to C. Molholm re: follow-up research on NJ special education law
2/9/2016	Seth Packrone	0:06:00	Billable	Teleconference with impacted organization re: potential intake
2/11/2016	Seth Packrone	0:12:00	Billable	Correspond with R Livengood re: intake at DOC facility
2/11/2016	Seth Packrone	0:12:00	Billable	Teleconference and follow up with impacted organization re: intake at DOC facility
2/16/2016	Seth Packrone	1:06:00	Billable	Legal research on NJ special education law and 18-21 in correctional facilities
2/16/2016	Seth Packrone	0:18:00	Billable	Send NJ legal research re: 18-21 year-olds in prison to M. Smith
2/17/2016	Michelle Caiola	0:12:00	Billable	strategy/direction with SP re research question
2/17/2016	Seth Packrone	0:06:00	Billable	Research and analyze NJ State law re: special education in correctional facilities
2/17/2016	Seth Packrone	0:24:00	Billable	Draft and send NJ research on state special education law to M. Smith
2/17/2016	Seth Packrone	0:18:00	Billable	Follow up with M. Smith re: updates on NJ prison investigation
2/17/2016	Seth Packrone	0:06:00	Billable	Teleconference with R. Livengood re: intake at DOC facility
2/17/2016	Seth Packrone	0:12:00	Billable	Strategy session with M. Caiola re: plan for prison investigation moving forward
2/17/2016	Seth Packrone	0:18:00	Billable	Prep for intake at DOC facility
2/17/2016	Seth Packrone	0:12:00	Billable	Teleconference with Administrative office at DOC facility to set up intake
2/18/2016	Michelle Caiola	0:06:00	Billable	update from SP re intake at DOC facility
2/18/2016	Seth Packrone	0:06:00	Billable	Strategy session with M. Caiola re: investigation next steps
2/25/2016	Seth Packrone	0:12:00	Billable	Teleconference with M. Smith re: next steps for investigation
2/25/2016	Seth Packrone	0:30:00	Billable	Draft follow-up correspondence with ACLU re: outstanding issues for investigation
2/26/2016	Michelle Caiola	0:24:00	Billable	Update and strategy with SP re: prison and intake
2/26/2016	Seth Packrone	0:18:00	Billable	Strategy session with M. Caiola re: next steps for investigation
2/26/2016	Seth Packrone	0:06:00	Billable	Teleconference with DOC facility re: update on status of intake
3/1/2016	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: next steps for investigation
3/4/2016	Seth Packrone	0:06:00	Billable	Teleconference with impacted organization re: status of DOC facility visit
3/4/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith to update on visitation status at DOC facility
3/7/2016	Mary-Lee Smith	0:12:00	Billable	Review email for NJ prison visit from S.Packrone
3/7/2016	Seth Packrone	0:06:00	Billable	Finalize plan for ACLU meeting
3/7/2016	Seth Packrone	0:06:00	Billable	Create agenda to prepare for intake and ACLU strategy meeting
3/7/2016	Seth Packrone	0:06:00	Billable	Research attorney visitation rules on DOC facility website
3/7/2016	Seth Packrone	0:06:00	Billable	Teleconference with DOC facility staff re: status of intake
3/7/2016	Seth Packrone	0:06:00	Billable	Follow up with impacted organization to update on status of intake
3/7/2016	Seth Packrone	0:24:00	Billable	Draft letter to DOC facility to request intake
3/7/2016	Seth Packrone	0:12:00	Billable	Follow up with M. Smith re: editing letter to DOC facility
3/7/2016	Seth Packrone	0:42:00	Billable	Fianlize and send letter re: intake request

3/7/2016	Seth Packrone	0:06:00	Billable	Teleconference with C. Molholm re: sending attorney visit request to DOC facility
3/7/2016	Seth Packrone	0:24:00	Billable	Outline memo on NJ special education law
3/7/2016	Seth Packrone	0:24:00	Billable	Background research on the NJ Department of Corrections regulations
3/7/2016	Seth Packrone	0:12:00	Billable	Legal research on NJ special education law
3/7/2016	Seth Packrone	0:30:00	Billable	Read and analyze Third circuit special education case: Buckley v. State Correctional Institution
3/7/2016	Seth Packrone	0:06:00	Billable	Follow up with impacted organization re: next intakes
3/7/2016	Seth Packrone	0:18:00	Billable	Read and take notes on Elizabeth Cate article re: special education services for youths in correctional facilities
3/7/2016	Seth Packrone	0:48:00	Billable	Read and take notes on case law around special education" and "department of corrections" in third circuit and NJ"
3/8/2016	Seth Packrone	0:12:00	Billable	Research and take notes on applicable IDEA segs
3/8/2016	Seth Packrone	0:06:00	Billable	Teleconference with DOC facility staff re: client visit
3/8/2016	Seth Packrone	0:06:00	Billable	Prepare for intake at DOC facility on Thursday
3/8/2016	Seth Packrone	0:06:00	Billable	Strategy session with M. Caiola re: intake at DOC facility
3/8/2016	Seth Packrone	0:24:00	Billable	Prepare logistics for intake at DOC facility
3/9/2016	Michelle Caiola	0:06:00	Billable	Direct SP re: approach for intake in prison
3/9/2016	Seth Packrone	0:12:00	Billable	Read old intake notes with DOC facility intake
3/9/2016	Seth Packrone	0:18:00	Billable	Teleconference with impacted organization re: other potential intakes in DOC custody
3/9/2016	Seth Packrone	0:06:00	Billable	Read other intake notes from DOC facility intake
3/9/2016	Seth Packrone	0:54:00	Billable	Draft and revise intake questions for young people in DOC custody
3/9/2016	Seth Packrone	0:06:00	Billable	Send intake questions and update on investigation to M. Smith
3/9/2016	Seth Packrone	0:06:00	Billable	Correspond with impacted organization re: potential clients for outreach
3/9/2016	Seth Packrone	0:30:00	Billable	Prepare for intake at DOC facility and send M. Smith questions and concerns
3/9/2016	Seth Packrone	0:06:00	Billable	Strategy session with M. Caiola re: follow up with potential client after intake
3/9/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: logistics for visit
3/9/2016	Seth Packrone	0:12:00	Billable	Prepare for intake at DOC facility
3/9/2016	Seth Packrone	0:36:00	Billable	Draft preliminary task list for NJ prison investigation
3/9/2016	Seth Packrone	0:06:00	Billable	Give directions to J. Mukherjee re: assisting with investigation
3/9/2016	Seth Packrone	0:06:00	Billable	Review NJ special education law
3/10/2016	Seth Packrone	0:30:00	Billable	Prepare for intake at DOC facility
3/10/2016	Seth Packrone	1:24:00	Billable	Travel to and from DOC facility for intake (overall it took 2.9; bill half)
3/10/2016	Seth Packrone	2:36:00	Billable	Conduct intake with potential client at DOC facility
3/10/2016	Seth Packrone	0:48:00	Billable	Summarize and analyze notes from intake at DOC facility
3/10/2016	Seth Packrone	0:18:00	Billable	Update notes and agenda to prepare for call with ACLU
3/11/2016	Mary-Lee Smith	0:24:00	Billable	Review notes from S.Packrone re prison visit
3/11/2016	Michelle Caiola	0:12:00	Billable	Update re prison visit/potential client
3/11/2016	Michelle Caiola	0:12:00	Billable	Review SP memo on status of investigation
3/11/2016	Seth Packrone	0:48:00	Billable	Update intake memo on DOC facility intake and task list
3/11/2016	Seth Packrone	0:06:00	Billable	Update stats on young people held in DOC
3/11/2016	Seth Packrone	0:12:00	Billable	Strategy session with M. Caiola re: intake update
3/11/2016	Seth Packrone	0:30:00	Billable	Teleconference with M. Smith to prepare for call with ACLU

3/11/2016	Seth Packrone	0:06:00	Billable	Follow up with ACLU re: logistics for call
3/11/2016	Seth Packrone	0:06:00	Billable	Prepare for call with ACLU
3/12/2016	Seth Packrone	0:06:00	Billable	Review and analyze email with updates on potential intakes from impacted organization
3/14/2016	Seth Packrone	0:06:00	Billable	Correspond with impacted organization re: DOC facility intake
3/14/2016	Seth Packrone	0:06:00	Billable	Teleconference with impacted organization re: upcoming intakes
3/14/2016	Seth Packrone	0:36:00	Billable	Compile list of potential intakes from DOC facility's publicly available info
3/14/2016	Seth Packrone	0:18:00	Billable	Teleconference with impacted organization re: school records and more intakes
3/14/2016	Seth Packrone	0:06:00	Billable	Update M. Smith on school records and potential intakes
3/14/2016	Seth Packrone	0:12:00	Billable	Follow up with impacted organization representatives re: potential intakes
3/15/2016	Seth Packrone	0:12:00	Billable	Give directions to J. Mukherjee re: NJ prison research
3/15/2016	Seth Packrone	0:06:00	Billable	Correspond with assignment directions re: prison research with J. Mukherjee
3/15/2016	Seth Packrone	0:30:00	Billable	Redraft and revise work plan for investigation in NJ prisons
3/15/2016	Seth Packrone	0:12:00	Billable	Review and analyze potential client's school records
3/15/2016	Seth Packrone	0:12:00	Billable	Review potential client's school records and respond to impacted organization
3/15/2016	Seth Packrone	0:24:00	Billable	Draft update to M. Smith re: investigation next steps
3/16/2016	Seth Packrone	0:06:00	Billable	Conference with J. Mukherjee re: attorney visit rules at NJ prisons
3/16/2016	Seth Packrone	0:54:00	Billable	Create chronology for potential client based on school records
3/16/2016	Seth Packrone	0:06:00	Billable	Give directions to J. Mukherjee re: information on NJ state prisons
3/16/2016	Seth Packrone	0:12:00	Billable	Schedule intake with potential client
3/16/2016	Seth Packrone	0:06:00	Billable	Give directions to Janet re: prison policies for attorney-client mail
3/17/2016	Seth Packrone	0:06:00	Billable	Follow up with impacted organization re: scheduling an intake with potential client
3/17/2016	Seth Packrone	0:06:00	Billable	Strategy session with M. Caiola re: next steps in investigation
3/17/2016	Seth Packrone	0:42:00	Billable	Draft chronology of potential client and reviewed records
3/17/2016	Seth Packrone	0:06:00	Billable	Review and analyze Pro Hac Vice procedures in NJ
3/17/2016	Seth Packrone	0:12:00	Billable	Draft records release for intakes
3/17/2016	Seth Packrone	0:12:00	Billable	Draft request for records for intakes
3/17/2016	Seth Packrone	0:48:00	Billable	Draft follow-up letter for potential client
3/17/2016	Seth Packrone	0:18:00	Billable	Teleconference with impacted organization re: potential client's records
3/17/2016	Seth Packrone	0:42:00	Billable	Begin to draft memo on IDEA protections for children, 18-21, in adult correctional facilities
3/18/2016	Seth Packrone	0:30:00	Billable	Take notes on legal research about relevant IDEA provisions
3/18/2016	Seth Packrone	0:36:00	Billable	Draft Section II of legal claim memo on 20 USC 1412(b)
3/18/2016	Seth Packrone	0:48:00	Billable	Research and draft Section III of legal claims memo on 20 USC 1412(b)
3/18/2016	Seth Packrone	0:30:00	Billable	Read and analyze Tunstall case and law review article for legal claims memo on relevant provisions
3/18/2016	Seth Packrone	0:06:00	Billable	Read and analyze NJAC special education for legal claims memo
3/18/2016	Seth Packrone	0:24:00	Billable	Draft section III(A) of legal claims memo on IDEA
3/18/2016	Seth Packrone	0:24:00	Billable	Draft section III(B) of legal claims memo on IDEA
3/18/2016	Seth Packrone	0:30:00	Billable	Revise and finalize legal claims memo on IDEA
3/18/2016	Seth Packrone	0:12:00	Billable	Send legal claims memo with comments to M. Smith
3/18/2016	Seth Packrone	0:12:00	Billable	Correspond and follow up with R Livengood re: records request from DOC facilities

3/18/2016	Seth Packrone	0:12:00	Billable	Edit and revise letter to potential intake based on R Livengood feedback
3/18/2016	Seth Packrone	0:18:00	Billable	Draft update for M. Smith on records request and intakes
3/21/2016	Mary-Lee Smith	0:18:00	Billable	Review memo re legal claims for 18-21 yo inmates with IEP from S.Packrone
3/21/2016	Mary-Lee Smith	0:18:00	Billable	Review and revise record release document
3/21/2016	Seth Packrone	0:12:00	Billable	Follow up with M. Smith re: documents for intakes and memo on NJ special education law
3/21/2016	Seth Packrone	0:36:00	Billable	Draft memo on NJ DOC Statistics about potential clients
3/22/2016	Mary-Lee Smith	0:24:00	Billable	Email exchange w/ S.Packrone re potential client in DOC custody and legal requirements under IDEA
3/22/2016	Seth Packrone	0:24:00	Billable	Edit and send letter to potential client to M. Smith for review
3/22/2016	Seth Packrone	0:06:00	Billable	Finalize blank release and follow up with M. Smith about it
3/22/2016	Seth Packrone	0:06:00	Billable	Teleconference with school official re: school records from school district for potential client
3/22/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: letter for release from potential client
3/22/2016	Seth Packrone	0:12:00	Billable	Give directions to J. Mukherjee about letter to potential client
3/22/2016	Seth Packrone	0:24:00	Billable	Finalize letter and release to send to potential client
3/22/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: letter to potential client
3/22/2016	Seth Packrone	0:12:00	Billable	Teleconference with school official re: retrieving public schools' client records
3/22/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: update meeting with the ACLU
3/23/2016	Mary-Lee Smith	0:06:00	Billable	Prep for call with ACLU re: S 2003 bill
3/23/2016	Mary-Lee Smith	0:12:00	Billable	Call with ACLU re S2003
3/23/2016	Mary-Lee Smith	0:18:00	Billable	Review memo from S.Packrone re S2003
3/23/2016	Michelle Caiola	0:18:00	Billable	SP apprise me of recent NJ law and relevance to going forward
3/23/2016	Seth Packrone	0:12:00	Billable	Schedule and confirm phone call with M. Smith and R Livengood from the ACLU re: S2003
3/23/2016	Seth Packrone	0:12:00	Billable	Prepare for call with M. Smith and Rebecca Livengood from the ACLU re: S2003
3/23/2016	Seth Packrone	0:12:00	Billable	Teleconference with R Livengood and M. Smith re: S 2003 bill and impact on investigation
3/23/2016	Seth Packrone	0:06:00	Billable	Follow up call with M. Smith re: next steps in NJ prison investigation
3/23/2016	Seth Packrone	1:30:00	Billable	Research and analyze S 2003 bill in NJ and its impact on potential class members
3/23/2016	Seth Packrone	0:24:00	Billable	Write up and send analysis on S 2003 bill to M. Smith
3/23/2016	Seth Packrone	0:18:00	Billable	Strategy session with M. Caiola re: next steps in NJ prison investigation
3/23/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: S 2003 bill and potential impact on class members
3/23/2016	Seth Packrone	0:06:00	Billable	Schedule follow-up call with M. Smith to discuss S 2003 bill's impact on investigation
3/24/2016	Mary-Lee Smith	0:30:00	Billable	Call w/ S.Packrone re NJ DOC and impact of S2003
3/24/2016	Mary-Lee Smith	0:18:00	Billable	Call w/ S.Seaborn re NJ DOC and impact of S2003 on investigation
3/24/2016	Seth Packrone	0:24:00	Billable	Teleconference with M. Smith re: S 2003
3/24/2016	Seth Packrone	0:12:00	Billable	Correspond with R. Livengood re: text of S 2003
3/24/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: next steps in prison investigation
3/25/2016	Mary-Lee Smith	0:54:00	Billable	Work on review of S2003 and interpretation there of
3/25/2016	Seth Packrone	0:18:00	Billable	Correspond with M. Smith re: S 2003 text
3/25/2016	Seth Packrone	0:06:00	Billable	Follow up with R Livengood re: S 2003 text
3/28/2016	Michelle Caiola	0:06:00	Billable	update from SP re: status of investigation
3/28/2016	Seth Packrone	0:24:00	Billable	Read, analyze, and respond to M. Smith's interpretation of S 2003 and its impact on potential class

3/28/2016	Seth Packrone	0:06:00	Billable	Follow up with R Livengood re: S 2003 text and impact on potential class
3/28/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Caiola re: update on S 2003 text and impact on potential class
3/28/2016	Seth Packrone	0:06:00	Billable	Teleconference with M. Smith re: edits to co-counsel agreement
3/28/2016	Seth Packrone	0:06:00	Billable	Follow up with impacted organization re: intakes at DOC facilities
3/29/2016	Seth Packrone	0:06:00	Billable	Prepare for call with DOC facility re: intake
3/29/2016	Seth Packrone	0:12:00	Billable	Teleconference with DOC facility staff re: scheduling an intake
3/29/2016	Seth Packrone	0:06:00	Billable	Draft letter to DOC facility re: intakes and sent to M. Smith
3/29/2016	Seth Packrone	0:06:00	Billable	Give directions to J. Mukherjee re: sending letter to DOC facility
3/29/2016	Seth Packrone	0:42:00	Billable	Teleconference with impacted organization re: updates and getting more information on potential intakes
3/29/2016	Seth Packrone	0:06:00	Billable	Update staff re: NJ DOC investigation status and input on next steps
3/29/2016	Seth Packrone	0:06:00	Billable	Update M. Smith on intakes and S 2003 after call with impacted organization
3/29/2016	Seth Packrone	0:06:00	Billable	Edit intake letter for student in DOC facility
3/29/2016	Seth Packrone	0:06:00	Billable	Review and sort S 2003 legal research and responses
3/30/2016	Mary-Lee Smith	0:18:00	Billable	Receive and review work plan for investigation from ACLU; make edits to timeline and add tasks
3/30/2016	Seth Packrone	0:12:00	Billable	Edits to letter to OC Facility and prepare to send
3/30/2016	Seth Packrone	0:06:00	Billable	Give directions to J. Mukherjee re: sending letter to DOC Facility
3/30/2016	Seth Packrone	0:18:00	Billable	Redraft work plan based on call with ACLU-NJ
3/30/2016	Seth Packrone	0:06:00	Billable	Follow up with impacted organization re: intakes with members of organization
3/30/2016	Seth Packrone	0:06:00	Billable	Follow up with RR Livengood re: edits to work plan in preparation for teleconference
3/30/2016	Seth Packrone	0:30:00	Billable	Review and analyze work plan for investigation
3/30/2016	Seth Packrone	0:12:00	Billable	Prepare for call with ACLU-NJ
3/30/2016	Seth Packrone	0:06:00	Billable	Send modified work plan in preparation for call with ACLU-NJ to R Livengood
4/4/2016	Seth Packrone	0:06:00	Billable	Read letter from DOC facility intake
4/4/2016	Seth Packrone	0:12:00	Billable	Conference with M. Caiola re: next steps for NJ prison investigation
4/4/2016	Seth Packrone	0:06:00	Billable	Teleconference with DOC facility staff about intake
4/4/2016	Seth Packrone	0:06:00	Billable	Update M. Smith re: upcoming intakes
4/4/2016	Seth Packrone	0:06:00	Billable	Schedule logistics for intake at DOC facility
4/5/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: records release signed from intake
4/5/2016	Seth Packrone	0:12:00	Billable	Review and edit intake questionnaire for DOC facility intake
4/5/2016	Seth Packrone	0:30:00	Billable	Prepare for intake at DOC facility on 4/6/16
4/5/2016	Seth Packrone	0:06:00	Billable	Prepare release form for intake
4/6/2016	Mary-Lee Smith	0:06:00	Billable	Instructions to S.Packrone re public records request
4/6/2016	Seth Packrone	1:54:00	Billable	Conduct intake at DOC facility
4/6/2016	Seth Packrone	0:06:00	Billable	Prepare for intake at DOC facility
4/6/2016	Seth Packrone	1:30:00	Billable	Travel to and from DOC facility to conduct intake (total 2 hr and 58 minutes, bill for half)
4/6/2016	Seth Packrone	0:06:00	Billable	Correspond with Rebecca Livengood from ACLU-NJ re: litigation committee approval
4/6/2016	Seth Packrone	0:06:00	Billable	Follow up with impacted organization records for impacted students
4/6/2016	Seth Packrone	0:06:00	Billable	Create task list for next steps in investigation
4/7/2016	Michelle Caiola	0:18:00	Billable	Update from SP re 2nd prison visit and facts of case

4/7/2016	Seth Packrone	0:06:00	Billable	Correspond with impacted organization re: updates on various students
4/7/2016	Seth Packrone	0:30:00	Billable	Draft intake summary for DOC facility intake re: elementary school
4/7/2016	Seth Packrone	0:18:00	Billable	Draft intake summary for DOC facility intake re: recent events
4/7/2016	Seth Packrone	0:18:00	Billable	Strategy session with M. Caiola re: DOC facility intake and potential assignments for summer interns
4/7/2016	Seth Packrone	0:12:00	Billable	Draft section of DOC facility intake re: time at DOC facility
4/7/2016	Seth Packrone	0:48:00	Billable	Draft section of DOC facility intake summary on other DOC facility and disability status
4/7/2016	Seth Packrone	0:24:00	Billable	Draft legal theories section of DOC facility intake events
4/7/2016	Seth Packrone	0:06:00	Billable	Send M. Smith intake summary and update on case
4/8/2016	Seth Packrone	0:18:00	Billable	Update M. Smith on next steps for DOC facility intake
4/8/2016	Seth Packrone	0:18:00	Billable	Research and write Public Records Request to NJ DOC for grievance forms
4/8/2016	Seth Packrone	0:24:00	Billable	Teleconference with impacted organization re: next intakes
4/8/2016	Seth Packrone	0:18:00	Billable	Read and analyze records received from DOC facility intake
4/8/2016	Seth Packrone	0:06:00	Billable	Update M. Smith on DOC facility records
4/8/2016	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: docs for intakes
4/8/2016	Seth Packrone	0:06:00	Billable	Read and analyze DOC facility response to grievance
4/11/2016	Mary-Lee Smith	0:12:00	Billable	Email exchange w/ S.Packrone re intakes
4/11/2016	Mary-Lee Smith	0:06:00	Billable	Review/revise letter to intake re release
4/12/2016	Mary-Lee Smith	0:18:00	Billable	Review and revise OPRA form re grievance process and forms
4/12/2016	Mary-Lee Smith	0:24:00	Billable	Review intakes from NJ DOC from S.Packrone; follow up with questions
4/12/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: public records request for grievance procedures
4/12/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: plan for meeting
4/13/2016	Seth Packrone	0:12:00	Billable	Read intake forms with various students
4/13/2016	Seth Packrone	0:30:00	Billable	Teleconference with M. Smith re: next steps in NJDOC investigation
4/13/2016	Seth Packrone	0:06:00	Billable	Prepare for call with ACLU-NJ
4/13/2016	Seth Packrone	0:30:00	Billable	Teleconference with R Livengood, ACLU-NJ re: next intakes
4/13/2016	Seth Packrone	0:12:00	Billable	Send update to M. Smith re: call with ACLU-NJ
4/13/2016	Seth Packrone	0:06:00	Billable	Send follow up information on intakes to R Livengood
4/13/2016	Seth Packrone	0:06:00	Billable	Give directions to J. Mukherjee re: records requests
4/13/2016	Seth Packrone	0:06:00	Billable	Prepare records requests for DOC facility intake
4/14/2016	Mary-Lee Smith	0:18:00	Billable	Review records requests for potential client #1 from S.Packrone
4/14/2016	Mary-Lee Smith	0:12:00	Billable	Review records requests for potential client #2 from S.Packrone
4/14/2016	Seth Packrone	0:06:00	Billable	Call with impacted organization to update on intakes
4/14/2016	Seth Packrone	0:12:00	Billable	Draft follow up letter to DOC facility intake
4/14/2016	Seth Packrone	0:18:00	Billable	Draft update letter to DOC facility intake
4/14/2016	Seth Packrone	0:24:00	Billable	Draft records request for DOC facility
4/14/2016	Seth Packrone	0:18:00	Billable	Draft records request for school district for intake
4/14/2016	Seth Packrone	0:06:00	Billable	Update M. Smith on progress with records requests letters
4/14/2016	Seth Packrone	0:24:00	Billable	Telconference with impacted organization re: next steps in investigation
4/14/2016	Seth Packrone	0:18:00	Billable	Edit and finalize DOC facility records request for intake

4/14/2016	Seth Packrone	0:12:00	Billable	Follow up on Open Public Records Request Act for NJ DOC with M. Smith and ACLU-NJ
4/15/2016	Michelle Caiola	0:06:00	Billable	Discuss claims with SP
4/15/2016	Michelle Caiola	0:06:00	Billable	Update SW re claims
4/15/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: records request letters
4/15/2016	Seth Packrone	0:06:00	Billable	Draft records request letters for DOC facility for intake
4/15/2016	Seth Packrone	0:18:00	Billable	Draft records request letter for DOC facility for intake
4/15/2016	Seth Packrone	0:12:00	Billable	Give directions to J. Mukherjee re: sending records request letters and letters to potential clients
4/15/2016	Seth Packrone	0:30:00	Billable	Draft records request letters for DOC facility and hospital for intake
4/15/2016	Seth Packrone	0:12:00	Billable	Edit update letter to send to DOC facility intake
4/15/2016	Seth Packrone	0:36:00	Billable	Finalize records request and update letters to send to potential clients
4/15/2016	Seth Packrone	0:12:00	Billable	Send records request letters and update letters to M. Smith
4/16/2016	Seth Packrone	0:06:00	Billable	Correspond with impacted organization re: next intakes
4/18/2016	Mary-Lee Smith	0:18:00	Billable	Email exchange and review visitation letter for new intake w/ S.Packrone
4/18/2016	Mary-Lee Smith	0:36:00	Billable	Review records release letters from S.Packrone for various potnetial clients.
4/18/2016	Michelle Caiola	0:06:00	Billable	update from SP re prison visit
4/18/2016	Michelle Caiola	0:12:00	Billable	update post meeting with parent's advocacy group (SP and SW)
4/18/2016	Seth Packrone	0:24:00	Billable	Teleconference with impacted organization re: information for next intakes
4/18/2016	Seth Packrone	0:12:00	Billable	Draft intake letter for new intake
4/18/2016	Seth Packrone	0:06:00	Billable	Send update on intakes to M. Smith with intake letter
4/18/2016	Seth Packrone	0:06:00	Billable	Correspond re: potential expert consultant
4/18/2016	Seth Packrone	0:18:00	Billable	Send intake letter to DOC facility for new intake
4/19/2016	Seth Packrone	0:24:00	Billable	Legal research and take notes on interactions between NJ DOC and school districts for student records
4/19/2016	Seth Packrone	0:06:00	Billable	Follow up about potential expert consultant
4/19/2016	Seth Packrone	0:18:00	Billable	Finalize letter to send to intake re: updating him on investigation progress
4/19/2016	Seth Packrone	0:24:00	Billable	Prepare records requests to be sent NJ DOC facilities for 2 potential clients
4/20/2016	Mary-Lee Smith	0:30:00	Billable	Work session with S.Packrone re NJ OPRA and intake questionnaire
4/20/2016	Seth Packrone	0:18:00	Billable	Draft next steps for investigation and actions items for this week
4/20/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: status of investigation
4/20/2016	Seth Packrone	0:12:00	Billable	Teleconference with M. Smith re: records requests and documents to send to ACLU-NJ
4/20/2016	Seth Packrone	0:06:00	Billable	Follow up with R Livengood from ACLU re: next meeting
4/20/2016	Seth Packrone	0:06:00	Billable	Correspond with R Livengood from ACLU-NJ re: public records request to send to NJ DOC
4/20/2016	Seth Packrone	0:30:00	Billable	Prepare documents to send to ACLU.NJ based on work plan
4/20/2016	Seth Packrone	0:06:00	Billable	Finalize records requests to send to school district
4/21/2016	Mary-Lee Smith	0:42:00	Billable	Call w/ S.Packrone and R.Livengood re due process jx and intakes
4/21/2016	Mary-Lee Smith	0:18:00	Billable	Work session with S.Packrone re intakes and next steps
4/21/2016	Seth Packrone	0:06:00	Billable	Strategy session with J. Mukherjee re: records requests moving forward
4/21/2016	Seth Packrone	0:36:00	Billable	Check in call with R Livengood and M. Smith re: next steps in NJ DOC investigation
4/21/2016	Seth Packrone	0:12:00	Billable	Follow up call with M. Smith re: next steps in NJ DOC investigation
4/21/2016	Seth Packrone	0:24:00	Billable	Finalize records request letters and releases to send to NJ DOC facilities

4/21/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: records requests
4/21/2016	Seth Packrone	0:18:00	Billable	Prepare for intake at DOC facility
4/22/2016	Seth Packrone	0:12:00	Billable	Prepare for next intake at DOC facility
4/22/2016	Seth Packrone	1:24:00	Billable	Travel to and from DOC facility to conduct intake (total 2 hr and 40 minutes, bill for half)
4/22/2016	Seth Packrone	0:42:00	Billable	Intake at DOC facility
4/22/2016	Seth Packrone	0:06:00	Billable	Give directions to J. Mukherjee re: documents from potential client
4/22/2016	Seth Packrone	0:48:00	Billable	Draft litigation memo for NJ DOC matter
4/22/2016	Seth Packrone	0:12:00	Billable	Review and analyze records from potential client
4/22/2016	Seth Packrone	0:06:00	Billable	Follow up research on new intake
4/22/2016	Seth Packrone	0:12:00	Billable	Update M. Smith re: records received from potential client
4/22/2016	Seth Packrone	0:36:00	Billable	Draft intake memo on new intake
4/22/2016	Seth Packrone	0:12:00	Billable	Research next intakes for investigation
4/23/2016	Seth Packrone	0:06:00	Billable	Read and analyze information from impacted organization potential claims
4/25/2016	Seth Packrone	0:30:00	Billable	Draft background research section of litigation committee memo
4/25/2016	Seth Packrone	0:30:00	Billable	Draft factual allegations section of litigation committee memo
4/25/2016	Seth Packrone	0:36:00	Billable	Draft legal violations section of litigation committee memo
4/25/2016	Seth Packrone	0:36:00	Billable	Draft causes of action section of litigation committee memo
4/25/2016	Seth Packrone	0:06:00	Billable	Read and analyze regulatory violations briefing from ACLU-NJ
4/25/2016	Seth Packrone	0:30:00	Billable	Edit, proofread, and send litigation committee memo to M. Smith
4/25/2016	Seth Packrone	0:06:00	Billable	Follow up with R Livengood from ACLU re: memo on jurisdiction of NJ OAL
4/25/2016	Seth Packrone	0:06:00	Billable	Update M. Smith re: OAL jurisdiction research and OPRA requests
4/26/2016	Mary-Lee Smith	0:30:00	Billable	Review lit committee memo and edit for S.Packrone
4/26/2016	Mary-Lee Smith	0:18:00	Billable	Review/revise OPRA re grievance from S.Packrone
4/26/2016	Seth Packrone	0:06:00	Billable	Read and analyze potential client's records
4/26/2016	Seth Packrone	0:12:00	Billable	Read and analyze impacted organization's studies and statistics and respond re: next intakes
4/26/2016	Seth Packrone	0:18:00	Billable	Research and take notes on NJ DOC facility
4/26/2016	Seth Packrone	0:18:00	Billable	Revise and edit OPRA request based on ACLU-NJ's feedback
4/26/2016	Seth Packrone	0:18:00	Billable	Give directions to J. Mukherjee and update her on investigation strategy
4/26/2016	Seth Packrone	0:18:00	Billable	Edit OPRA and send to ACLU-NJ for final approval
4/26/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: details on the NJ DOC facilities
4/26/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: research for jurisdictional issue for NJ OAL
4/26/2016	Seth Packrone	0:12:00	Billable	Submit OPRA request for NJDOC grievance procedures
4/26/2016	Seth Packrone	0:42:00	Billable	Edit Litigation Committee Memo based on M. Smith's comments
4/27/2016	Mary-Lee Smith	0:12:00	Billable	Review/revise lit committee memo for NJ DOC
4/27/2016	Mary-Lee Smith	0:30:00	Billable	Work session with S.Packrone re new intakes and OAL jx issues
4/27/2016	Mary-Lee Smith	0:36:00	Billable	Research jurisdiction of OAL to hear class claims
4/27/2016	Seth Packrone	0:18:00	Billable	Read and analyze data from impacted organization re: new intakes
4/27/2016	Seth Packrone	0:24:00	Billable	Research jurisdiction of NJ OAL
4/27/2016	Seth Packrone	0:24:00	Billable	Teleconference with M. Smith re: next steps for NJ DOC investigation

4/27/2016	Seth Packrone	0:36:00	Billable	Finalize and send litigation committee memo to litigation committee
4/27/2016	Seth Packrone	0:18:00	Billable	Review and analyze ACLU NJ's memo on OAL jurisdiction
4/27/2016	Seth Packrone	0:18:00	Billable	Update ACLU-NJ on next intakes
4/27/2016	Seth Packrone	0:06:00	Billable	Follow up with impacted organization re: public testimony from students
4/28/2016	Mary-Lee Smith	0:12:00	Billable	Review agenda for co-counsel meeting from S.Packrone
4/28/2016	Mary-Lee Smith	0:12:00	Billable	Review revised workplan for co-counsel meeting from S.Packrone
4/28/2016	Mary-Lee Smith	0:36:00	Billable	Further research into OAL decisions re ADA/504 claims
4/28/2016	Seth Packrone	0:12:00	Billable	Respond to ACLU re: tracking data in spreadsheets for investigation
4/28/2016	Seth Packrone	0:12:00	Billable	Draft agenda for 4.29.16 co-counsel meeting
4/28/2016	Seth Packrone	0:18:00	Billable	Draft updated work plan for NJ DOC investigation
4/28/2016	Seth Packrone	0:06:00	Billable	Send agenda/work plan to M. Smith with update
4/28/2016	Seth Packrone	0:12:00	Billable	Finalize potential client records request to hospital
4/28/2016	Seth Packrone	0:06:00	Billable	Send agenda/work plan to ACLU-NJ for meeting
4/28/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: materials for 4/29 co-counsel meeting
4/29/2016	Mary-Lee Smith	0:42:00	Billable	Call w/ S.Packrone and R.Livengood re intakes, doc requests and OAL jurisdiction
4/29/2016	Seth Packrone	0:12:00	Billable	Read and analyze research on jurisdiction of NJ OAL
4/29/2016	Seth Packrone	0:30:00	Billable	Teleconference with R Livengood, ACLU-NJ re: progress in investigation with M. Smith
4/29/2016	Seth Packrone	0:06:00	Billable	Follow up conference with M. Smith re: upcoming deadlines for NJ DOC investigation
5/2/2016	Michelle Caiola	0:12:00	Billable	update from SP re next steps for investigation
5/2/2016	Seth Packrone	0:06:00	Billable	Conference with C. Molholm re: next steps in investigation
5/2/2016	Seth Packrone	0:12:00	Billable	Respond to R Livengood from ACLU-NJ re: next steps for relevant docs
5/3/2016	Seth Packrone	0:12:00	Billable	Read and analyze research on exhausting admin remedies in NJ
5/3/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: exhausting admin remedies in NJ
5/3/2016	Seth Packrone	0:12:00	Billable	Strategy session with J. Mukherjee re: update on NJDOC investigation and next steps for tracking information
5/3/2016	Seth Packrone	0:30:00	Billable	Draft and send new intake request letter to DOC facility
5/3/2016	Seth Packrone	0:48:00	Billable	Analyze and incorporate ACLU-NJ's changes to general intake forms
5/3/2016	Seth Packrone	0:06:00	Billable	Strategy session with J. Mukherjee re: spreadsheets to track information about intakes
5/3/2016	Seth Packrone	0:18:00	Billable	Send intake general form to ACLU-NJ with changes noted
5/4/2016	Mary-Lee Smith	0:24:00	Billable	Revise retainer for this case; send to S.Packrone
5/4/2016	Mary-Lee Smith	0:18:00	Billable	Discuss retainer revisions with S.Packrone
5/4/2016	Michelle Caiola	0:06:00	Billable	update from SP
5/4/2016	Seth Packrone	0:12:00	Billable	Create NJDOC task list for next steps in investigation
5/4/2016	Seth Packrone	0:12:00	Billable	Review and finalize intake questionnaire
5/4/2016	Seth Packrone	0:06:00	Billable	Confirm visit to DOC facility for next intake
5/4/2016	Seth Packrone	0:12:00	Billable	Draft letter to potential client to update him on next steps
5/4/2016	Seth Packrone	0:06:00	Billable	Update team at DRA on NJDOC investigation
5/4/2016	Seth Packrone	0:12:00	Billable	Conference with M. Caiola re: update her on investigation progress
5/4/2016	Seth Packrone	0:36:00	Billable	Revise retainer for NJDOC clients
5/4/2016	Seth Packrone	0:12:00	Billable	Strategy session with M. Caiola re: scope of retainer

5/4/2016	Seth Packrone	0:12:00	Billable	Draft letter to potential client to update him on next steps
5/4/2016	Seth Packrone	0:18:00	Billable	Revise and edit spreadsheet about intake process
5/4/2016	Seth Packrone	0:18:00	Billable	Follow up with the ACLU re: scheduling meeting with NJ special education advocates and spreadsheet
5/4/2016	Seth Packrone	0:12:00	Billable	Finalize letters to send to potential clients
5/4/2016	Seth Packrone	0:12:00	Billable	Prepare for new intake at DOC facility
5/5/2016	Mary-Lee Smith	0:48:00	Billable	Revised joint retainer
5/5/2016	Mary-Lee Smith	0:18:00	Billable	Review spreadsheet for intakes for NJ DOC
5/5/2016	Michelle Caiola	0:24:00	Billable	T/c with SP re retainer, changes, law
5/5/2016	Seth Packrone	0:06:00	Billable	Update M. Smith re: new intake
5/5/2016	Seth Packrone	0:36:00	Billable	Update and revise spreadsheet tracking intakes for investigation
5/5/2016	Seth Packrone	1:18:00	Billable	Prepare retainer for NJDOC clients
5/5/2016	Seth Packrone	1:24:00	Billable	Travel to and from DOC facility for student intakes (2.7 total - bill half)
5/5/2016	Seth Packrone	1:12:00	Billable	Intake with potential client at DOC facility
5/5/2016	Seth Packrone	0:06:00	Billable	Plan meeting with NJ special education advocate re: education class actions in NJ
5/5/2016	Seth Packrone	0:12:00	Billable	Finalize letters to send to potential clients
5/5/2016	Seth Packrone	0:12:00	Billable	Draft agenda for co-counsel meeting
5/5/2016	Seth Packrone	0:06:00	Billable	Send agenda and spreadsheet to ACLU-NJ
5/5/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: meeting with potential expert consultant
5/5/2016	Seth Packrone	0:12:00	Billable	Strategy session with F. Pitts re: update on investigation
5/6/2016	Mary-Lee Smith	0:48:00	Billable	Revise retainer agreement for DOC clients
5/6/2016	Seth Packrone	0:06:00	Billable	Follow up with Bill Silverman re: meeting with M. Smith to discuss pro bono support
5/6/2016	Seth Packrone	0:12:00	Billable	Strategy session with J. Mukherjee and R. Rodgers re: update on intakes
5/6/2016	Seth Packrone	1:12:00	Billable	Teleconference with impacted organization re: next intakes to conduct and call from potential client
5/6/2016	Seth Packrone	0:12:00	Billable	Revise and edit retainer for NJ DOC clients
5/6/2016	Seth Packrone	0:06:00	Billable	Conference with J. Mukherjee re: next intake
5/6/2016	Seth Packrone	0:06:00	Billable	Update letter to send to potential client to update him on status of investigation
5/6/2016	Seth Packrone	0:06:00	Billable	Follow up with Bill Silverman re: meeting with M. Smith to discuss pro bono support
5/6/2016	Seth Packrone	0:06:00	Billable	Update M. Caiola re: retainer and intakes progress
5/6/2016	Seth Packrone	0:12:00	Billable	Teleconference with M. Smith re: agenda for call with ACLU and next intakes
5/6/2016	Seth Packrone	0:24:00	Billable	Co-counsel call with ACLU and M. Smith re: NJ DOC investigation
5/9/2016	Michelle Caiola	0:18:00	Billable	update from SP and MLK re meeting with Proskauer and next steps
5/9/2016	Seth Packrone	0:18:00	Billable	Draft plan for meeting with Proskauer
5/10/2016	Mary-Lee Smith	0:42:00	Billable	Meeting w/ B.Silverman re pro bono support for NJ DOC
5/10/2016	Seth Packrone	0:42:00	Billable	Conference with Bill Silverman and M. Smith re: potential co-counsel on NJ DOC matter
5/10/2016	Seth Packrone	0:18:00	Billable	Travel to and from Proskauer Rose to meet with Bill Silverman (total was 40 minutes, bill for half)
5/10/2016	Seth Packrone	0:18:00	Billable	Follow up strategy session with M. Smith re: next steps in NJ DOC investigation
5/10/2016	Seth Packrone	0:06:00	Billable	Read and analyze ACLU's changes to intake spreadsheet
5/10/2016	Seth Packrone	0:06:00	Billable	Draft and send follow up email to Bill Silverman re: next meeting to discuss NJ DOC matter
5/10/2016	Seth Packrone	0:06:00	Billable	Read and analyze response to OPRA request from NJ DOC

5/10/2016	Seth Packrone	0:06:00	Billable	Follow up with ACLU re: next steps for OPRA requests
5/10/2016	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood from ACLU re: edits to spreadsheet tracking intakes
5/10/2016	Seth Packrone	0:06:00	Billable	Follow up about Bill Silverman re: pro bono support
5/11/2016	Mary-Lee Smith	0:48:00	Billable	Work session with NJ special education advocates and ACLU-NJ re strategy for bringing education claims against NJ DOC
5/11/2016	Seth Packrone	0:12:00	Billable	Read and edit joint retainer to send to ACLU.NJ
5/11/2016	Seth Packrone	0:36:00	Billable	Teleconference with NJ special education advocates re: strategy for bringing claims against NJ DOC (with ACLU-NJ and M. Smith)
5/11/2016	Seth Packrone	0:12:00	Billable	Teleconference with R. Livengood and J. LoCicero and M. Smith re: call with NJ special education advocate
5/11/2016	Seth Packrone	0:06:00	Billable	Follow up strategy session with M. Smith re: next steps in jurisdictional research
5/11/2016	Seth Packrone	0:30:00	Billable	Strategy session with M. Smith re: next steps in investigation for intakes and researach
5/12/2016	Seth Packrone	0:06:00	Billable	Send IDEA exhaustion case law to M. Smith
5/12/2016	Seth Packrone	0:24:00	Billable	Analyze M. Smith's litigation strategy based on exhaustion case law in the Third Circuit
5/12/2016	Seth Packrone	0:48:00	Billable	Conduct legal research on exhaustion in the Third Circuit
5/12/2016	Seth Packrone	0:18:00	Billable	Write up and analyze exhaustion case law in Third Circuit for M. Smith
5/12/2016	Seth Packrone	0:18:00	Billable	Analyze ACLU.NJ's OPRA responses from NJ DOC
5/12/2016	Seth Packrone	0:30:00	Billable	Draft OPRA request for NJ DOC policies/procedures for special education
5/12/2016	Seth Packrone	0:18:00	Billable	Draft agenda and list next intakes for ACLU.NJ co-counsel meeting
5/13/2016	Mary-Lee Smith	0:18:00	Billable	Work session w/ S.Packrone re exhausting clients' claims
5/13/2016	Mary-Lee Smith	0:36:00	Billable	Work session w/ ACLU re intakes, exhaustion and retainer with clients
5/13/2016	Seth Packrone	0:12:00	Billable	Send retainer and agenda to ACLU for co-counsel meeting
5/13/2016	Seth Packrone	0:06:00	Billable	Review updated agenda and respond to ACLU.NJ re: co-counsel meeting
5/13/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: plan for co-counsel meeting
5/13/2016	Seth Packrone	0:18:00	Billable	Teleconference with M. Smith re: strategy for filing class complaint against NJDOC
5/13/2016	Seth Packrone	0:30:00	Billable	Conference call with R. Livengood (ACLU-NJ) and M. Smith re: updates on intakes and investigation strategy moving forward
5/13/2016	Seth Packrone	0:12:00	Billable	Follow up strategy session with M. Smith re: next steps in work plan for NJ DOC investigation
5/13/2016	Seth Packrone	0:06:00	Billable	Update M. Caiola on strategy for filing class complaint
5/13/2016	Seth Packrone	0:12:00	Billable	Edit joint retainer based on ACLU.NJ's feedback
5/13/2016	Seth Packrone	0:18:00	Billable	Draft and send letter request to conduct new intakes at DOC facility
5/13/2016	Seth Packrone	0:12:00	Billable	Edit and revise OPRA request for special education policies at NJDOC
5/13/2016	Seth Packrone	0:12:00	Billable	Send documents to ACLU.NJ re: records requests
5/13/2016	Seth Packrone	0:06:00	Billable	Correspond re: follow up on strategy based on call with NJ special education advocate
5/16/2016	Seth Packrone	0:18:00	Billable	Revise OPRA request for NJ DOC special education policies and send to ACLU.NJ
5/16/2016	Seth Packrone	0:06:00	Billable	Read and analyze exhaustion materials in Third Circuit
5/16/2016	Seth Packrone	0:06:00	Billable	Draft work plan for week based on next steps for investigation
5/16/2016	Seth Packrone	0:06:00	Billable	Strategy session with M. Caiola re: division of work
5/16/2016	Seth Packrone	0:06:00	Billable	Correspond with C. Molholm and J. Mukherjee re: assignments for investigation
5/16/2016	Seth Packrone	0:30:00	Billable	Read and analyze ACLU.NJ's OPRA responses from NJ DOC re: special education policies and teacher qualifications
5/16/2016	Seth Packrone	0:24:00	Billable	Give directions to C. Molholm re: assignments for NJ DOC investigation to track intakes
5/16/2016	Seth Packrone	0:06:00	Billable	Send relevant intake documents to C. Molholm re: tracking intake information
5/16/2016	Seth Packrone	0:30:00	Billable	Read, analyze, and take notes on exhaustion language in DNJ case law

5/16/2016	Seth Packrone	0:06:00	Billable	Finalize for intake at DOC facility
5/16/2016	Seth Packrone	0:06:00	Billable	Strategy session on what to request through OPRA process with M. Caiola
5/16/2016	Seth Packrone	0:12:00	Billable	Finalize and send proposed joint retainer to ACLU.NJ
5/17/2016	Mary-Lee Smith	0:24:00	Billable	Work session with S.Packrone re OPRA and case plan
5/17/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: grievance OPRA request response from NJ DOC
5/17/2016	Seth Packrone	0:06:00	Billable	Analyze and edit spreadsheet tracking NJ DOC intakes
5/17/2016	Seth Packrone	0:12:00	Billable	Strategy session with C. Molholm re: editing the spreadsheet tracking NJ DOC intakes
5/17/2016	Seth Packrone	0:06:00	Billable	Respond to NJ DOC records custodian re: format of OPRA request
5/17/2016	Seth Packrone	0:12:00	Billable	Draft update letter to send to new intake at DOC facility
5/17/2016	Seth Packrone	0:06:00	Billable	Follow up with C. Molholm re: edits to spreadsheet tracking intakes
5/17/2016	Seth Packrone	0:30:00	Billable	Strategy session with M. Smith re: next steps in NJ DOC investigation
5/17/2016	Seth Packrone	0:06:00	Billable	Send potential client letter to M. Smith and ask for input
5/17/2016	Seth Packrone	0:06:00	Billable	Finalize letter to send to potential client
5/17/2016	Seth Packrone	0:18:00	Billable	Give directions to J. Mukherjee re: tracking NJ DOC records requests
5/17/2016	Seth Packrone	0:42:00	Billable	Edit OPRA request based on ACLU's comments and send back to ACLU
5/17/2016	Seth Packrone	0:12:00	Billable	Prepare for next intake at DOC facility
5/18/2016	Seth Packrone	0:06:00	Billable	Follow up with impacted organization re: potential client update
5/18/2016	Seth Packrone	0:24:00	Billable	Write up background information and criminal background from intake at DOC facility
5/18/2016	Seth Packrone	1:18:00	Billable	Travel to and from DOC facility to conduct new intake (2.6 total - bill half)
5/18/2016	Seth Packrone	0:18:00	Billable	Teleconference with impacted organization re: following up on records requests with schools and prisons
5/18/2016	Seth Packrone	1:18:00	Billable	Intake at DOC facility with student
5/18/2016	Seth Packrone	0:36:00	Billable	Draft educational history section of student intake summary
5/18/2016	Seth Packrone	0:06:00	Billable	Send DOC facility intake summary to C. Molholm with instructions about adding it to the spreadsheet
5/18/2016	Seth Packrone	0:42:00	Billable	Redraft work plan based on exhaustion strategy
5/18/2016	Seth Packrone	0:06:00	Billable	Teleconference with J. Mukherjee re: records requests information and drafting an intake request letter
5/18/2016	Seth Packrone	0:06:00	Billable	Read and analyze C. Molholm's edits to spreadsheet tracking intakes
5/18/2016	Seth Packrone	0:06:00	Billable	Send information about Mountainview intakes to J. Mukherjee for her to request visits
5/18/2016	Seth Packrone	0:06:00	Billable	Draft task list for NJ DOC investigation next steps
5/18/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: edits to OPRA request and submitting it
5/18/2016	Seth Packrone	0:06:00	Billable	Teleconference with J. Mukherjee re: logistics for intakes at DOC facility
5/18/2016	Seth Packrone	0:36:00	Billable	Revise and edit OPRA request for NJ DOC special education policies
5/19/2016	Mary-Lee Smith	0:48:00	Billable	Review/revise work plan for NJ DOC case
5/19/2016	Michelle Caiola	0:06:00	Billable	update from SP re intakes at NJ DOC
5/19/2016	Seth Packrone	0:12:00	Billable	Strategy session with C. Molholm re: status of intakes and another intake at DOC facility
5/19/2016	Seth Packrone	0:06:00	Billable	Strategy session with M. Caiola re: update NJ DOC intakes
5/19/2016	Seth Packrone	0:06:00	Billable	Give directions to J. Mukherjee re: next steps in records requests
5/19/2016	Seth Packrone	0:06:00	Billable	Finalize follow up records requests to hospital for potential intake
5/19/2016	Seth Packrone	0:12:00	Billable	Draft agenda for co-counsel meeting
5/19/2016	Seth Packrone	0:18:00	Billable	Finalize spreadsheet tracking intakes to send to ACLU.NJ

5/19/2016	Seth Packrone	0:12:00	Billable	Send update with spreadsheet and agenda to M. Smith with comments
5/19/2016	Seth Packrone	0:06:00	Billable	Give directions to J. Mukherjee re: next steps in records requests to NJ DOC facilities
5/19/2016	Seth Packrone	0:18:00	Billable	Finalize records requests to send to DOC facility
5/19/2016	Seth Packrone	0:06:00	Billable	Conference with J. Mukherjee re: following up with school district
5/19/2016	Seth Packrone	0:12:00	Billable	Send agenda and spreadsheet with update to ACLU.NJ
5/20/2016	Mary-Lee Smith	0:36:00	Billable	Call w/ ACLU re intakes and filing complaint
5/20/2016	Mary-Lee Smith	0:12:00	Billable	Call w/ S.Packrone re intakes
5/20/2016	Seth Packrone	0:36:00	Billable	Incorporate M. Smith's comments into new work plan for filing strategy
5/20/2016	Seth Packrone	0:06:00	Billable	Send updated work plan to co-counsel in preparation for co-counsel meeting
5/20/2016	Seth Packrone	0:30:00	Billable	Teleconference with ACLU.NJ re: case strategy check-in
5/20/2016	Seth Packrone	0:12:00	Billable	Strategy session with M. Smith re: case memo
5/20/2016	Seth Packrone	0:12:00	Billable	Strategy session with J. Mukherjee re: next records requests and intakes
5/20/2016	Seth Packrone	0:06:00	Billable	Strategy session with M. Caiola re: update on case strategy
5/23/2016	Seth Packrone	0:18:00	Billable	Follow up with ACLU.NJ re: in-person meeting and status of intakes and outreach message to concerned organization
5/23/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: co-counsel meetings and strategy sessions
5/24/2016	Mary-Lee Smith	1:00:00	Billable	Review outreach docs from ACLU
5/24/2016	Seth Packrone	0:06:00	Billable	Strategy session with J. Mukherjee re: following up with school district records
5/24/2016	Seth Packrone	0:12:00	Billable	Update M. Caiola re: status of investigation
5/24/2016	Seth Packrone	0:06:00	Billable	Read and analyze potential client's educational records
5/24/2016	Seth Packrone	0:06:00	Billable	Follow up with school district re: potential client's school records
5/24/2016	Seth Packrone	0:12:00	Billable	Edit and revise ACLU.NJ's Dear Colleague letter to impacted students
5/24/2016	Seth Packrone	0:12:00	Billable	Edit and revise ACLU.NJ's outreach letter to potential clients
5/24/2016	Seth Packrone	0:42:00	Billable	Teleconference with impacted organization re: updates on next intakes and status of current intakes
5/24/2016	Seth Packrone	0:06:00	Billable	Send ACLU.NJ's letters to M. Smith re: outreach to concerned organizations
5/24/2016	Seth Packrone	0:12:00	Billable	Strategy session with J. Mukherjee re: next records requests
5/24/2016	Seth Packrone	0:06:00	Billable	Edit and finalize records request to school for potential client
5/24/2016	Seth Packrone	0:06:00	Billable	Give directions to J. Mukherjee re: tracking NJ DOC records in the spreadsheet
5/25/2016	Mary-Lee Smith	0:24:00	Billable	Final revisions to outreach docs for DOC investigation; email exchanges re same
5/25/2016	Seth Packrone	0:06:00	Billable	Read and analyze M. Smith's comments on outreach documents
5/25/2016	Seth Packrone	1:00:00	Billable	Edit and revise outreach docs based on M. Smith's comments
5/25/2016	Seth Packrone	0:18:00	Billable	Draft follow up email for ACLU with comments on outreach docs
5/25/2016	Seth Packrone	0:06:00	Billable	Send updated outreachdocs to co-counsel
5/25/2016	Seth Packrone	0:06:00	Billable	Read and analyze NJ DOC response to OPRA request for grievance policies
5/25/2016	Seth Packrone	0:06:00	Billable	Give directions to J. Mukherjee re: filing OPRA request
5/25/2016	Seth Packrone	0:06:00	Billable	Follow up with litigation team re: outreach
5/25/2016	Seth Packrone	0:12:00	Billable	Finalize documents requests for potential client to send to DOC facility
5/25/2016	Seth Packrone	0:06:00	Billable	Give directions J. Mukherjee re: requesting records from DOC facility
5/25/2016	Seth Packrone	0:12:00	Billable	Revise and edit outreach letter to concerned organizations
5/25/2016	Seth Packrone	0:18:00	Billable	Correspond with ACLU.NJ and M. Smith re: outreach letter

5/26/2016	Mary-Lee Smith	1:06:00	Billable	Review OPRA grievance documents; take notes
5/26/2016	Michelle Caiola	0:12:00	Billable	position on intake strategy with SP
5/26/2016	Seth Packrone	0:12:00	Billable	Strategy session with M. Caiola re: identifying clients and declarants
5/26/2016	Seth Packrone	0:30:00	Billable	Read and analyze response to OPRA request re: grievance policies from NJ DOC
5/26/2016	Seth Packrone	0:30:00	Billable	Write up initial analysis of NJ DOC response to OPRA request and send to M. Smith
5/26/2016	Seth Packrone	0:06:00	Billable	Read and analyze classification procedures at DOC facility
5/26/2016	Seth Packrone	0:06:00	Billable	Give directions to J. Mukherjee re: sending OPRA response to ACLU.NJ
5/26/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: directions for reviewing OPRA request response
5/26/2016	Seth Packrone	0:12:00	Billable	Draft follow up letter to send to DOC facility intake
5/26/2016	Seth Packrone	0:06:00	Billable	Update M. Smith on school records received for potential client
5/27/2016	Seth Packrone	0:06:00	Billable	Strategy session with J. Mukherjee re: response from hospital for potential client records
5/27/2016	Seth Packrone	0:18:00	Billable	Read and analyze OPRA denials from NJDOC
5/27/2016	Seth Packrone	0:06:00	Billable	Research and analyze NJ DOC statistics for young offenders
5/27/2016	Seth Packrone	0:06:00	Billable	Read and analyze NJ DOC's denial of OPRA requests for special education policies
5/27/2016	Seth Packrone	0:06:00	Billable	Teleconference with attorney from school district about potential client's records
5/31/2016	Seth Packrone	0:12:00	Billable	Correspond with ACLU.NJ re: next intakes and OPRA response
5/31/2016	Seth Packrone	0:06:00	Billable	Strategy session with J. Mukherjee re: next intakes for NJ DOC
5/31/2016	Seth Packrone	0:06:00	Billable	Strategy session with J. Mukherjee re: sending intake request to DOC facility
5/31/2016	Seth Packrone	0:12:00	Billable	Finalize letter to DOC facility re: visits with students
6/1/2016	Michelle Caiola	0:12:00	Billable	Check in with SP re complaint/memo assignment for questions
6/1/2016	Seth Packrone	0:42:00	Billable	Read, analyze, and take notes on ADA claims about ad seg.
6/1/2016	Seth Packrone	1:30:00	Billable	Draft section of case memo re: IDEA and ad seg policies
6/1/2016	Seth Packrone	0:12:00	Billable	Read, analyze, and take notes on NJ DOC handbook for administrative segregation
6/1/2016	Seth Packrone	0:06:00	Billable	Give direction to J. Mukherjee re: sending OPRA response to ACLU.NJ
6/1/2016	Seth Packrone	0:48:00	Billable	Draft section of case memo re: ADA and ad seg policies/practices
6/1/2016	Seth Packrone	0:06:00	Billable	Strategy session with M. Caiola re: next steps in NJ DOC investigation
6/1/2016	Seth Packrone	0:06:00	Billable	Review and finalize update to ACLU re: OPRA response
6/1/2016	Seth Packrone	0:06:00	Billable	Teleconference with administrator at DOC facility re: visitation request
6/1/2016	Seth Packrone	0:48:00	Billable	Draft section of case memo re: educational violations per the IDEA and ADA
6/1/2016	Seth Packrone	0:18:00	Billable	Draft and research section of case memo re: ADA's integration mandate
6/1/2016	Seth Packrone	0:24:00	Billable	Send NJ DOC update to M. Smith re: case memo and agenda for discussion tomorrow
6/1/2016	Seth Packrone	0:12:00	Billable	Update J. Mukherjee re: status of records requests letters
6/2/2016	Mary-Lee Smith	0:42:00	Billable	Work session w/ S.Packrone re case memo and intakes
6/2/2016	Seth Packrone	0:06:00	Billable	Call with DOC facility re: upcoming student intakes
6/2/2016	Seth Packrone	0:06:00	Billable	Send documents to B. Kitchelt re: NJ DOC legal memos
6/2/2016	Seth Packrone	0:12:00	Billable	Read and analyze NJ DOC policies on grievances filed by inmates
6/2/2016	Seth Packrone	0:30:00	Billable	Teleconference with M. Smith re: edits to case memo and legal theories for case
6/2/2016	Seth Packrone	0:12:00	Billable	Draft agenda for ACLU.NJ co-counsel meeting on 6.3.16
6/2/2016	Seth Packrone	0:06:00	Billable	Send agenda/update to M. Smith

6/2/2016	Seth Packrone	0:06:00	Billable	Teleconference with M. Smith re: process for reviewing NJ DOC handbooks
6/2/2016	Seth Packrone	0:18:00	Billable	Send agenda and update to litigation team re: co-counsel call 6.3.16
6/2/2016	Seth Packrone	0:06:00	Billable	Give directions to J. Mukherjee re: intake release and records requests
6/2/2016	Seth Packrone	0:12:00	Billable	Prepare for intakes with DOC facility students
6/3/2016	Mary-Lee Smith	0:30:00	Billable	Call w/ ACLU and S.Packrone re intakes, outreach and research needed
6/3/2016	Seth Packrone	0:06:00	Billable	Finalize and edit letter to next intake
6/3/2016	Seth Packrone	0:48:00	Billable	Draft and analyze notes from new student's intake
6/3/2016	Seth Packrone	0:12:00	Billable	Draft and analyze new student intake's potential legal claims based on intake
6/3/2016	Seth Packrone	0:06:00	Billable	Follow up with B. Kitchelt and R. Livengood re: third circuit exhaustion case law
6/3/2016	Seth Packrone	0:12:00	Billable	Prepare for intakes at DOC facility
6/3/2016	Seth Packrone	0:24:00	Billable	Read, analyze, and take notes on NJ DOC Inmate Procedure 002.IRS.00 document
6/3/2016	Seth Packrone	0:06:00	Billable	Read, analyze, and take notes on NJ DOC procedure document 002.001
6/3/2016	Seth Packrone	0:06:00	Billable	Read, analyze, and take notes on NJ DOC procedure document on ADA grievances
6/3/2016	Seth Packrone	1:36:00	Billable	Intakes at DOC facility
6/3/2016	Seth Packrone	1:12:00	Billable	Travel to and from DOC facility (2.4 total, bill half)
6/3/2016	Seth Packrone	0:42:00	Billable	Strategy session with ACLU.NJ and M. Smith re: next steps in NJ DOC investigation
6/6/2016	Mary-Lee Smith	0:24:00	Billable	Call w/ S.Packrone re DOC issues
6/6/2016	Seth Packrone	0:06:00	Billable	Read and analyze school records for potential client
6/6/2016	Seth Packrone	0:06:00	Billable	Read and analyze potential client's ADA complaints
6/6/2016	Seth Packrone	0:12:00	Billable	Update M. Smith re: status of potential client's education complaints
6/6/2016	Seth Packrone	0:24:00	Billable	Strategy session with M. Caiola re: upcoming intakes at NJ DOC facilities
6/6/2016	Seth Packrone	0:12:00	Billable	Read, analyze, and take notes on potential client's IEP
6/6/2016	Seth Packrone	0:06:00	Billable	Read, analyze, and take notes on potential client's IEP
6/6/2016	Seth Packrone	0:12:00	Billable	Strategy session with M. Smith re: next steps for updating potential clients
6/6/2016	Seth Packrone	0:06:00	Billable	Strategy session with M. Caiola re: next steps for visiting clients
6/6/2016	Seth Packrone	0:06:00	Billable	Read and analyze letter from potential client
6/6/2016	Seth Packrone	0:24:00	Billable	Update ACLU re: potential client's records and ad seg placement
6/6/2016	Seth Packrone	0:06:00	Billable	Update M. Smith re: potential client's ad seg placement
6/7/2016	Seth Packrone	0:24:00	Billable	Read and analyze grievance exhaustion procedures at NJSP
6/7/2016	Seth Packrone	0:24:00	Billable	Read and analyze grievance exhaustion procedures at Wagner
6/7/2016	Seth Packrone	0:18:00	Billable	Read and analyze grievance exhaustion policies at Garden State
6/7/2016	Seth Packrone	0:24:00	Billable	Compare and analyze overall NJ DOC grievance procedures to specific facilities
6/7/2016	Seth Packrone	0:06:00	Billable	Draft memo on NJ DOC grievance policies
6/8/2016	Seth Packrone	0:12:00	Billable	Read and analyze NJ DOC grievance process
6/8/2016	Seth Packrone	0:06:00	Billable	Finalize response to hospitale re: potential client's records
6/8/2016	Seth Packrone	0:54:00	Billable	Draft grievance memo based on NJ DOC procedures memo
6/8/2016	Seth Packrone	0:42:00	Billable	Draft grievance memo based on NJ DOC ADA grievance procedures memo
6/8/2016	Seth Packrone	0:06:00	Billable	Draft grievance memo based on NJSP grievance policy memo
6/8/2016	Seth Packrone	0:24:00	Billable	Finalize and send grievance memo to team based on NJ DOC procedures

6/9/2016	Michelle Caiola	0:18:00	Billable	strategy issues for getting complaint filed with SP
6/9/2016	Michelle Caiola	0:06:00	Billable	new org p idea discussed with SP
6/9/2016	Seth Packrone	0:24:00	Billable	Draft grievance memo based on Garden State grievance policies
6/9/2016	Seth Packrone	0:18:00	Billable	Draft grievance memo based on NJSP grievance policy memo
6/9/2016	Seth Packrone	0:18:00	Billable	Draft grievance memo based on Wagner policy memo
6/9/2016	Seth Packrone	0:12:00	Billable	Revise and finalize grievance memo
6/9/2016	Seth Packrone	0:36:00	Billable	Draft litigation strategy update for M. Smith and update on grievance policy information
6/9/2016	Seth Packrone	0:06:00	Billable	Strategy session with M. Caiola re: potential organizational plaintiffs
6/10/2016	Mary-Lee Smith	0:24:00	Billable	Work session w/ S.Packrone re DOC intakes and org P.
6/10/2016	Seth Packrone	0:24:00	Billable	Draft educational legal analysis section of case memo
6/10/2016	Seth Packrone	0:42:00	Billable	Strategy session with B. Kitchel re: exhaustion research and different pleading strategies
6/10/2016	Seth Packrone	0:06:00	Billable	Give B. Kitchel directions re: impact of new NJ law on juvenile waiver system and DOC populations
6/10/2016	Seth Packrone	0:06:00	Billable	Follow up with impacted organization re: impacted members
6/10/2016	Seth Packrone	0:06:00	Billable	Read through potential client's medical records
6/10/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: litigation strategy moving forward
6/10/2016	Seth Packrone	0:18:00	Billable	Teleconference with M. Smith re: litigation strategy moving forward
6/10/2016	Seth Packrone	0:12:00	Billable	Strategy session with M. Caiola re: litigation strategy moving forward in NJ DOC matter
6/10/2016	Seth Packrone	0:12:00	Billable	Send grievance memo and short description to co-counsel
6/10/2016	Seth Packrone	0:12:00	Billable	Strategy session with B. Kitchel re: exhaustion research and new client records
6/10/2016	Seth Packrone	0:30:00	Billable	Draft Garden State Section of case memo
6/13/2016	Seth Packrone	0:06:00	Billable	Correspond with C. Molholm re: new intake
6/13/2016	Seth Packrone	0:12:00	Billable	Correspond with impacted organization re: update on NJ DOC investigation
6/13/2016	Seth Packrone	0:18:00	Billable	Add section on Mountainview to case memo
6/13/2016	Seth Packrone	0:12:00	Billable	Add section on NJSP to Case Memo
6/13/2016	Seth Packrone	0:06:00	Billable	Add section on CRAF to Case memo
6/13/2016	Seth Packrone	0:12:00	Billable	Draft factual background and remaining questions in the Education section of Case Memo
6/13/2016	Seth Packrone	0:24:00	Billable	Draft factual background of administrative segregation section of case memo
6/14/2016	Mary-Lee Smith	0:36:00	Billable	Review case memo re legal claims
6/14/2016	Seth Packrone	0:06:00	Billable	Teleconference with DOC facility administrator re: contact list for potential client
6/14/2016	Seth Packrone	0:06:00	Billable	Strategy session with J. Mukherjee re; research into the NJ DOC handbooks
6/14/2016	Seth Packrone	0:12:00	Billable	Draft factual background section of education section of case memo
6/14/2016	Seth Packrone	0:36:00	Billable	Draft section on education in administrative segregation section of Wagner
6/14/2016	Seth Packrone	0:18:00	Billable	Draft section on education in administrative segregation section of Garden State in case memo
6/14/2016	Seth Packrone	0:18:00	Billable	Draft factual background section of administrative segregation section of case memo
6/14/2016	Seth Packrone	0:12:00	Billable	Strategy session with M. Caiola re: investigation next steps
6/14/2016	Seth Packrone	0:06:00	Billable	Update M. Smith re: NJ DOC investigation next steps
6/14/2016	Seth Packrone	0:36:00	Billable	Draft education IDEA legal claims section of case memo
6/14/2016	Seth Packrone	0:24:00	Billable	Draft education ADA legal claims section of case memo
6/14/2016	Seth Packrone	0:42:00	Billable	Draft ADA legal claims section under administrative segregation section of case memo

6/14/2016	Seth Packrone	0:18:00	Billable	Draft education legal claims section of administrative segregation section of case memo
6/14/2016	Seth Packrone	1:00:00	Billable	Revise and edit case memo draft
6/15/2016	Mary-Lee Smith	0:12:00	Billable	Prep for call with impacted organization re: potential org. plaintiff status
6/15/2016	Mary-Lee Smith	0:30:00	Billable	Call with impacted organization re org as org Plaintiff
6/15/2016	Seth Packrone	0:06:00	Billable	Strategy session with B. Kitchelt re: exhaustion law in Third Circuit
6/15/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: updated case memo
6/15/2016	Seth Packrone	0:24:00	Billable	Read and analyze exhaustion case law from B. Kitchelt's memo
6/15/2016	Seth Packrone	0:06:00	Billable	Prepare for meeting with ACLU-NJ re: status of case
6/15/2016	Seth Packrone	0:42:00	Billable	Strategy session with B. Kitchel re: update on exhaustion law in Third Circuit
6/15/2016	Seth Packrone	0:12:00	Billable	Draft agenda for in-person meeting with ACLU re: status of case
6/15/2016	Seth Packrone	0:18:00	Billable	Send materials to ACLU with update to ACLU for in-person strategy session
6/15/2016	Seth Packrone	0:06:00	Billable	Send memo to M. Smith re: update on tomorrow's meeting
6/15/2016	Seth Packrone	0:30:00	Billable	Teleconference with M. Smith and impacted organization re: litigation strategy and update on intakes
6/15/2016	Seth Packrone	0:12:00	Billable	Follow up strategy session with M. Smith re: next steps in NJ DOC investigation
6/15/2016	Seth Packrone	0:12:00	Billable	Strategy session with M. Caiola re: next steps in NJ DOC investigation
6/16/2016	Mary-Lee Smith	1:42:00	Billable	Work session with ACLU re org P, legal claims and OPRA request
6/16/2016	Mary-Lee Smith	0:30:00	Billable	Prep for work session with ACLU re legal claims: review GF complaint/legal theories and memo re same
6/16/2016	Michelle Caiola	0:24:00	Billable	strategy T/c with SP re agenda for meeting and new P org
6/16/2016	Seth Packrone	0:06:00	Billable	Check in with M. Caiola re: today's meeting and retainer
6/16/2016	Seth Packrone	0:06:00	Billable	Update M. Smith on plan for today's meeting
6/16/2016	Seth Packrone	1:48:00	Billable	Strategy session re: next steps in NJ DOC litigation at ACLU.Nj with R Livengood, J LoCicero, M. Smith, and B. Kitchelt
6/16/2016	Seth Packrone	1:00:00	Billable	Travel to and from ACLU.NJ for in-person strategy session (2 hours total)
6/16/2016	Seth Packrone	0:12:00	Billable	Follow up with impacted organization re: plan to speak about organizational plaintiff status
6/16/2016	Seth Packrone	0:06:00	Billable	Teleconference with M. Caiola re: next steps in NJ DOC litigation
6/16/2016	Seth Packrone	0:12:00	Billable	Prepare for meeting with co-counsel
6/16/2016	Seth Packrone	0:06:00	Billable	Teleconference with B. Kitchelt re: CRAF education
6/16/2016	Seth Packrone	0:24:00	Billable	Teleconference with M. Caiola re: next steps in NJ DOC litigation
6/16/2016	Seth Packrone	0:12:00	Billable	Teleconference with M. Smith re: next steps for NJDOC investigation
6/16/2016	Seth Packrone	0:06:00	Billable	Revise task list and send to M. Smith
6/17/2016	Seth Packrone	0:06:00	Billable	Follow up with impacted organization re: organizational plaintiff status
6/17/2016	Seth Packrone	0:12:00	Billable	Give directions to B. Kitchelt re: read and analyze facility handbooks for education and disability policies
6/17/2016	Seth Packrone	0:18:00	Billable	Strategy session with M. Caiola re: next steps in NJ DOC investigation
6/17/2016	Seth Packrone	0:06:00	Billable	Give directions to J. Mukherjee re: records requests
6/17/2016	Seth Packrone	0:06:00	Billable	Correspond with B. Kitchelt re: graduation requirements and IEPs
6/20/2016	Michelle Caiola	0:12:00	Billable	status update with SP re meeting with impacted organization representatives
6/20/2016	Seth Packrone	0:06:00	Billable	Follow up with impacted organization re: new intakes in NJ DOC
6/20/2016	Seth Packrone	0:06:00	Billable	Research requirement to provide FAPE if someone receives high school diploma
6/20/2016	Seth Packrone	0:06:00	Billable	Correspond with impacted organization re: intake status
6/20/2016	Seth Packrone	0:36:00	Billable	Teleconference with impacted organization re: organizational plaintiff status and next steps

6/20/2016	Seth Packrone	0:06:00	Billable	Strategy session with M. Caiola re: next steps with impacted organization
6/20/2016	Seth Packrone	0:06:00	Billable	Finalize records request for new intake
6/20/2016	Seth Packrone	0:12:00	Billable	Give instructions to B. Kitchel re: analyzing NJ DOC handbooks for pertinent policies
6/20/2016	Seth Packrone	0:12:00	Billable	Teleconference with R Livengood re: outreach to students
6/20/2016	Seth Packrone	0:06:00	Billable	Correspond with impacted organization re: organizational plaintiff status
6/21/2016	Michelle Caiola	0:18:00	Billable	Strategy with SP re filing steps, deadlines, etc.
6/21/2016	Michelle Caiola	0:24:00	Billable	Review retainer with organizational plaintiff, provide edits, feedback to SP
6/21/2016	Michelle Caiola	0:30:00	Billable	Review letter to potential p's and provide edits and feedback to SP
6/21/2016	Seth Packrone	0:54:00	Billable	Draft joint retainer for organizational plaintiff
6/21/2016	Seth Packrone	0:18:00	Billable	Strategy session with M. Caiola re: next steps with organizational plaintiff
6/21/2016	Seth Packrone	0:30:00	Billable	Draft update letter to send to potential client on case strategy
6/21/2016	Seth Packrone	0:12:00	Billable	Draft update letter to potential client #2 re: update on case strategy
6/21/2016	Seth Packrone	0:18:00	Billable	Update M. Smith re: NJ DOC investigation
6/21/2016	Seth Packrone	0:12:00	Billable	Strategy session with M. Caiola re: retainer for organizational plaintiff
6/21/2016	Seth Packrone	0:12:00	Billable	Update M. Smith re: next steps in NJDOC investigation
6/21/2016	Seth Packrone	0:12:00	Billable	Strategy session with M. Caiola re: client update letters and draft organizational retainer
6/21/2016	Seth Packrone	0:06:00	Billable	Finalize letters to send to clients
6/21/2016	Seth Packrone	0:12:00	Billable	Draft update for ACLU re: joint retainer for organizational plaintiff and letters to clients
6/21/2016	Seth Packrone	0:06:00	Billable	Update co-counsel re: new intakes
6/21/2016	Seth Packrone	0:06:00	Billable	Correspond with R Livengood re: outreach to impacted groups
6/22/2016	Seth Packrone	0:18:00	Billable	Give directions to B. Kitchelt re: next steps for legal research
6/22/2016	Seth Packrone	0:12:00	Billable	Strategy session with M. Caiola re: next steps in investigation
6/23/2016	Seth Packrone	0:12:00	Billable	Strategy session with M. Caiola re: next steps in investigation
6/23/2016	Seth Packrone	0:18:00	Billable	Give instructions to B. Kitchelt re: potential client's medical records and disability profile
6/23/2016	Seth Packrone	0:12:00	Billable	Give instructions to B. Kitchelt re: NJ DOC facility handbooks
6/24/2016	Seth Packrone	0:06:00	Billable	Call to R Livengood, co-counsel re: status of case
6/24/2016	Seth Packrone	0:12:00	Billable	Finalize update letters for 2 potential clients
6/24/2016	Seth Packrone	0:06:00	Billable	Update M. Smith re: communications with clients and organizational retainer
6/24/2016	Seth Packrone	0:06:00	Billable	Strategy session with B. Kitchelt re: potential client 1's special education claims
6/24/2016	Seth Packrone	0:06:00	Billable	Give directions to J. Mukherjee re: contacting potential clients
6/24/2016	Seth Packrone	0:06:00	Billable	Teleconference with R Livengood re: agenda for co-counsel meeting
6/24/2016	Seth Packrone	0:12:00	Billable	Draft agenda for co-counsel meeting with ACLU-NJ
6/24/2016	Seth Packrone	0:12:00	Billable	Strategy session with B. Kitchelt re: potential plaintiffs legal claims
6/24/2016	Seth Packrone	0:30:00	Billable	Teleconference with R Livengood and J LoCicero from ACLU-NJ and B. Kitchel re: potential plaintiffs and next steps
6/24/2016	Seth Packrone	0:18:00	Billable	Read and analyze research re: right to FAPE with a high school diploma
6/24/2016	Seth Packrone	0:18:00	Billable	Strategy session with B. Kitchelt re: next steps in NJDOC investigation
6/24/2016	Seth Packrone	0:24:00	Billable	Teleconference with impacted organization re: next steps as an organizational plaintiff
6/28/2016	Seth Packrone	0:12:00	Billable	Read and analyze research on diplomas and IDEA to send to co-counsel
6/29/2016	Mary-Lee Smith	0:18:00	Billable	receive and review update re intakes and OPRA from S.Packrone; email excahnge re same

6/29/2016	Seth Packrone	0:12:00	Billable	Read and analyze grievance procedures at NJ DOC to prepare to draft model grievances
6/29/2016	Seth Packrone	0:18:00	Billable	Revise and edit ADA model grievance
6/29/2016	Seth Packrone	0:24:00	Billable	Revise and edit IRS model grievance
6/29/2016	Seth Packrone	0:06:00	Billable	Finalize ADA and IRS model grievance drafts
6/29/2016	Seth Packrone	0:06:00	Billable	Strategy session with J. Mukherjee re: next steps in requesting records from NJ DOC
6/29/2016	Seth Packrone	0:12:00	Billable	Teleconference with Kendra Hall from NJ DOC Office of Regulatory and Legal Affairs re: plaintiff's record requests
6/29/2016	Seth Packrone	0:48:00	Billable	Draft and send full NJ DOC investigation update for M. Smith
6/29/2016	Seth Packrone	0:12:00	Billable	Strategy session with B. Kitchelt re: how to frame child violation in the complaint
6/29/2016	Seth Packrone	0:30:00	Billable	Read, analyze, and take notes on legal research around the definition of disability under IDEA
6/29/2016	Seth Packrone	0:12:00	Billable	Read, analyze, and take notes on records for plaintiff from NJ DOC
6/29/2016	Seth Packrone	0:06:00	Billable	Send M. Smith summary re: plaintiff's records from NJ DOC
6/29/2016	Seth Packrone	0:18:00	Billable	Give directions to B. Kitchelt re: legal analysis of organizational standing for NJPC
6/29/2016	Seth Packrone	0:36:00	Billable	Strategy session with B. Kitchelt re: third circuit law around child find and definition of disability
6/29/2016	Seth Packrone	0:06:00	Billable	Strategy session with B. Kitchelt re: edits to model grievances
6/30/2016	Mary-Lee Smith	0:54:00	Billable	Prep for work session with S.Packrone: review issue list and memo re disability under IDEA
6/30/2016	Mary-Lee Smith	0:30:00	Billable	Work session with S.Packrone re intakes, issue list and legal research
6/30/2016	Seth Packrone	0:30:00	Billable	Teleconference with M. Smith re: update on litigation next steps, intakes, legal research
6/30/2016	Seth Packrone	0:06:00	Billable	Follow up with potential organizational plaintiff
6/30/2016	Seth Packrone	0:12:00	Billable	Draft agenda for co-counsel meeting call
6/30/2016	Seth Packrone	0:12:00	Billable	Draft litigation task list and next steps
6/30/2016	Seth Packrone	0:06:00	Billable	Send agenda and litigation task list to ACLU-NJ
7/1/2016	Mary-Lee Smith	0:42:00	Billable	Work session with ACLU re intakes, PLRA issues and retainers
7/1/2016	Seth Packrone	0:06:00	Billable	Correspond with co-counsel, R Livengood re: client update letters
7/1/2016	Seth Packrone	0:06:00	Billable	Read and analyze co-counsel's OPRA submission re: DOE documents and correspond about it
7/1/2016	Seth Packrone	0:42:00	Billable	Conference call with co-counsel and M. Smith and B. Kitchel re: next steps for NJDOC investigation
7/1/2016	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: next steps in NJ DOC investigation
7/6/2016	Mary-Lee Smith	0:18:00	Billable	Work session with S.Packrone re OPRA and flyer to impacted community groups
7/6/2016	Mary-Lee Smith	0:24:00	Billable	Draft email to R.Livengood re outreach; revise outreach flyer
7/6/2016	Mary-Lee Smith	0:12:00	Billable	Final revisions to outreach flyer; send to R.Livengood
7/6/2016	Mary-Lee Smith	0:12:00	Billable	Review agenda from S.Packrone for Proskauer call
7/6/2016	Seth Packrone	0:12:00	Billable	Correspond with co-counsel re: next steps in visiting clients and retainers
7/6/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: next steps in NJ DOC investigation
7/6/2016	Seth Packrone	0:18:00	Billable	Finalize joint retainer for organizational plaintiff
7/6/2016	Seth Packrone	0:06:00	Billable	Send joint retainer to organizational plaintiff
7/6/2016	Seth Packrone	0:06:00	Billable	Follow up with co-counsel, R. Livengood, re: next steps with organizational plaintiff
7/6/2016	Seth Packrone	0:06:00	Billable	Follow up with Bill Silverman re: teleconference to discuss NJ DOC investigation
7/6/2016	Seth Packrone	0:12:00	Billable	Prepare for strategy session with M. Smith re: compiling next steps in investigation
7/6/2016	Seth Packrone	0:18:00	Billable	Teleconference with M. Smith re: agenda for tomorrow's call
7/6/2016	Seth Packrone	0:24:00	Billable	Teleconference with M. Smith re: outreach to impacted groups

7/6/2016	Seth Packrone	0:12:00	Billable	Draft agenda for tomorrow's call
7/6/2016	Seth Packrone	0:24:00	Billable	Revise and edit outreach flyer to community groups
7/6/2016	Seth Packrone	0:24:00	Billable	Revise and edit individual retainer for clients
7/6/2016	Seth Packrone	0:06:00	Billable	Finalize outreach flyer to community groups
7/7/2016	Mary-Lee Smith	0:24:00	Billable	Review/revise individual retainer for clients
7/7/2016	Seth Packrone	0:06:00	Billable	Correspond with co-counsel, R Livengood re: organizational plaintiff retainer
7/7/2016	Seth Packrone	0:06:00	Billable	Correspond with organizational plaintiff re: retainer for organizational plaintiff
7/7/2016	Seth Packrone	0:06:00	Billable	Finalize strategy session to discuss organizational plaintiff retainer
7/7/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: visiting potential client at DOC facility
7/7/2016	Seth Packrone	0:06:00	Billable	Prepare for call with parent of intake
7/7/2016	Seth Packrone	0:18:00	Billable	Teleconference with parent of intake re: his disability status
7/7/2016	Seth Packrone	0:06:00	Billable	Strategy session with B. Kitchelt re: records requests
7/7/2016	Seth Packrone	0:06:00	Billable	Teleconference with school district re: potential client's records
7/7/2016	Seth Packrone	0:06:00	Billable	Teleconference with school district re: potential client's records
7/7/2016	Seth Packrone	0:06:00	Billable	Read and analyze potential client's educational records and letter
7/7/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: call with potential pro bono counsel
7/7/2016	Seth Packrone	0:06:00	Billable	Correspond with R Livengood (co-counsel) re: meeting with potential client
7/7/2016	Seth Packrone	0:06:00	Billable	Strategy session with B. Kitchelt re: organizational standing for impacted organization
7/7/2016	Seth Packrone	0:06:00	Billable	Teleconference with M. Smith re: next steps for investigation
7/7/2016	Seth Packrone	0:12:00	Billable	Draft agenda for call w investigation team
7/7/2016	Seth Packrone	0:30:00	Billable	Read, analyze, and edit memo on case law around standing for potential organizational plaintiff
7/7/2016	Seth Packrone	0:12:00	Billable	Strategy session with B. Kitchelt re: grievance procedures for NJ DOC
7/7/2016	Seth Packrone	0:06:00	Billable	Follow up teleconference with school district re: potential client's records
7/7/2016	Seth Packrone	0:18:00	Billable	Draft investigation update for M. Smith
7/7/2016	Seth Packrone	0:06:00	Billable	Send update on potential client to M. Smith and B. Kitchel
7/7/2016	Seth Packrone	0:18:00	Billable	Send materials for co-counsel call and agenda to ACLU
7/8/2016	Mary-Lee Smith	0:30:00	Billable	Work session with ACLU and lit team re clients, OPRA, pro bono and legal research
7/8/2016	Michelle Caiola	0:06:00	Billable	update re potential co-counsel and next steps
7/8/2016	Seth Packrone	0:06:00	Billable	Strategy session with M. Caiola re: next steps in investigation
7/8/2016	Seth Packrone	0:12:00	Billable	Prepare for client meetings on Monday morning
7/8/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: potential client's complaints
7/8/2016	Seth Packrone	0:06:00	Billable	Send potential client's docs to ACLU-NJ
7/8/2016	Seth Packrone	0:06:00	Billable	Strategy session with B. Kitchel re: meeting with potential client
7/8/2016	Seth Packrone	0:30:00	Billable	Conference call with ACLU-NJ (Rebecca Livengood and Jeanne LoCicero) and M. Smith and B. Kitchelt re: next steps in NJ DOC investigation
7/8/2016	Seth Packrone	0:06:00	Billable	Get directions from M. Smith re: client retainers
7/8/2016	Seth Packrone	0:12:00	Billable	Teleconference with potential client's former school re: records
7/8/2016	Seth Packrone	0:06:00	Billable	Work with J. Mukherjee to prepare files for Monday's visits
7/10/2016	Seth Packrone	0:24:00	Billable	Prepare for follow-up meetings with potential clients
7/11/2016	Seth Packrone	1:42:00	Billable	Travel to and from DOC facilities for potential client meetings (3.4 in total - bill half)

7/11/2016	Seth Packrone	1:06:00	Billable	Wait at DOC facility for intake with potential client #1
7/11/2016	Seth Packrone	1:00:00	Billable	Meeting with ACLU-NJ re: retainer
7/11/2016	Seth Packrone	0:30:00	Billable	Wait at DOC facility for prison to set up visit with potential client
7/11/2016	Seth Packrone	1:24:00	Billable	Meeting with potential client #1 at DOC facility to go over retainer with R. Livengood from ACLU-NJ
7/11/2016	Seth Packrone	0:12:00	Billable	Update M. Smith re: meeting with potential client #1 and retainer conversation
7/11/2016	Seth Packrone	1:24:00	Billable	Meeting with potential client #2 to review retainer and go over case strategy
7/12/2016	Seth Packrone	0:06:00	Billable	Update M. Smith re: meeting with potential client and retainer conversation
7/12/2016	Seth Packrone	0:06:00	Billable	Give directions to J. Mukherjee re: follow up with documents for potential client
7/12/2016	Seth Packrone	0:18:00	Billable	Give directions to B. Kitchelt re: review of potential client's documents
7/12/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: potential client's documents
7/12/2016	Seth Packrone	0:06:00	Billable	Strategy session with B. Kitchelt re: findings from potential client's education documents
7/13/2016	Seth Packrone	0:06:00	Billable	Create task list for next steps in litigation following client meetings with potential clients 1 and 2
7/13/2016	Seth Packrone	0:06:00	Billable	Correspond with ACLU-NJ (Rebecca Livengood) re: documents for call with impacted organization
7/13/2016	Seth Packrone	0:18:00	Billable	Prepare for call with representatives from impacted organization
7/13/2016	Seth Packrone	0:06:00	Billable	Update B. Kitchelt re: visits with potential clients 1 and 2
7/13/2016	Seth Packrone	1:06:00	Billable	Teleconference with ACLU-NJ and impacted organization re: representation agreement for impacted organization
7/13/2016	Seth Packrone	0:12:00	Billable	Follow up strategy session with B. Kitchelt re: next steps for organizational plaintiff
7/13/2016	Seth Packrone	0:06:00	Billable	Teleconference with M. Smith re: next steps for NJ DOC investigation
7/13/2016	Seth Packrone	0:06:00	Billable	Update M. Smith re: call with impacted organization about the representation agreement
7/13/2016	Seth Packrone	0:06:00	Billable	Strategy session with B. Kitchelt re: update on potential client's records
7/13/2016	Seth Packrone	0:12:00	Billable	Follow up with ACLU-NJ re: next steps for organizational plaintiff
7/14/2016	Mary-Lee Smith	0:12:00	Billable	Discuss potential organizational plaintiff retainer with S.Packrone
7/14/2016	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: language in retainer for potential organizational plaintiff
7/14/2016	Seth Packrone	0:06:00	Billable	Follow up with representative from impacted organization re: representation agreement
7/14/2016	Seth Packrone	0:06:00	Billable	Teleconference with M. Smith re: next steps in NJ DOC investigation
7/15/2016	Seth Packrone	0:06:00	Billable	Read and respond to OPRA request response for records custodian
7/15/2016	Seth Packrone	0:18:00	Billable	Teleconference with ACLU co-counsel R Livengood re: next steps for investigation
7/15/2016	Seth Packrone	0:12:00	Billable	Update M. Smith re: next steps in NJ DOC investigation
7/16/2016	Seth Packrone	0:06:00	Billable	Correspond with potential organizational plaintiff re: signed retainer
7/18/2016	Seth Packrone	0:06:00	Billable	Correspond with potential organizational plaintiff re: signed retainer
7/18/2016	Seth Packrone	0:06:00	Billable	Send potential organizational plaintiff documents to R Livengood re: interview with organizational plaintiff
7/18/2016	Seth Packrone	0:12:00	Billable	Read and analyze B. Kitchelt's summary of client's educational records
7/18/2016	Seth Packrone	0:30:00	Billable	Give directions to B. Kitchelt re: drafting the complaint and redrafting legal research memos
7/19/2016	Seth Packrone	0:06:00	Billable	Finalize retainer for potential organizational plaintiff
7/19/2016	Seth Packrone	0:06:00	Billable	Correspond with co-counsel, ACLU-NJ, re: next steps for potential organizational plaintiff retainer
7/19/2016	Seth Packrone	0:12:00	Billable	Teleconference with potential organizational plaintiff re: next round of intakes
7/19/2016	Seth Packrone	0:12:00	Billable	Draft agenda for call with ACLU
7/19/2016	Seth Packrone	0:06:00	Billable	Correspond with Rebecca Livengood (co-counsel) re: next intakes
7/19/2016	Seth Packrone	0:06:00	Billable	Send agenda to M. Smith re: co-counsel call with ACLU

7/20/2016	Mary-Lee Smith	0:18:00	Billable	Review memo re ed docs from client; email follow up questions
7/20/2016	Mary-Lee Smith	0:12:00	Billable	Review memo for co-counsel
7/20/2016	Mary-Lee Smith	0:06:00	Billable	Review agenda for team meeting
7/20/2016	Seth Packrone	0:06:00	Billable	Strategy session with B. Kitchelt re: client's records
7/20/2016	Seth Packrone	0:06:00	Billable	Correspond with co-counsel re: next co-counsel meeting
7/20/2016	Seth Packrone	0:12:00	Billable	Teleconference with M. Smith re: agenda for call with ACLU-NJ
7/21/2016	Mary-Lee Smith	0:36:00	Billable	work session with ACLU and S.Packrone and summer re intakes and court to file in and comp ed
7/21/2016	Mary-Lee Smith	0:12:00	Billable	Call with S.Packrone and summer re next steps post ACLU call
7/21/2016	Mary-Lee Smith	0:24:00	Billable	Legal research into organizational standing for potential organizational plaintiff
7/21/2016	Michelle Caiola	0:12:00	Billable	strategize re ACLU concerns for fed court v. state ct
7/21/2016	Seth Packrone	0:06:00	Billable	Correspond with ACLU-NJ re: next co-counsel meeting
7/21/2016	Seth Packrone	0:06:00	Billable	Teleconference with potential client's former school re: docs
7/21/2016	Seth Packrone	0:12:00	Billable	Strategy session with B. Kitchelt re: update on client's records
7/21/2016	Seth Packrone	0:36:00	Billable	Teleconference with co-counsel (Rebecca Livengood, J. LoCicero) and M Smith re: next steps in litigation
7/21/2016	Seth Packrone	0:12:00	Billable	Teleconference with M. Smith re: next steps for legal research
7/21/2016	Seth Packrone	0:06:00	Billable	Give directions to B. Kitchelt re: removal of IDEA claims from state to federal court
7/21/2016	Seth Packrone	0:06:00	Billable	Strategy session with M. Caiola re: state vs. federal court
7/21/2016	Seth Packrone	0:06:00	Billable	Send executed retainer to potential organizational plaintiff representative
7/22/2016	Mary-Lee Smith	0:06:00	Billable	Email to S.Packrone re Proskauer assignments/meeting
7/22/2016	Seth Packrone	0:06:00	Billable	Teleconference with client re: moved from isolation
7/22/2016	Seth Packrone	0:06:00	Billable	Update litigation team re: call with client
7/22/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: confidentiality issues
7/22/2016	Seth Packrone	0:06:00	Billable	Correspond with potential organizational plaintiff re: confidentiality issues
7/26/2016	Seth Packrone	0:12:00	Billable	Draft response to potential organizational plaintiff re: confidentiality question
7/26/2016	Seth Packrone	0:06:00	Billable	Follow up with R. Livengood re: new intake
7/27/2016	Seth Packrone	0:06:00	Billable	Correspond with ACLU-NJ and potentnl organizational plaintiff re: intake forms
7/28/2016	Seth Packrone	0:12:00	Billable	Correspond with M. smith re: agenda for ACLU meeting tomorrow
7/28/2016	Seth Packrone	0:12:00	Billable	Read and analyze documents from ACLU-NJ
7/28/2016	Seth Packrone	0:12:00	Billable	Draft agenda for ACLU meeting on Thursday
7/28/2016	Seth Packrone	0:12:00	Billable	Strategy session with B. Kitchelt re: next steps in legal research for NJDOC matter
7/28/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: meeting with Bill Silverman
7/29/2016	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: meeting with Bill Silverman
7/29/2016	Seth Packrone	0:06:00	Billable	Strategy session with B. Kitchelt re: standing for potential organizational plaintiff
7/29/2016	Seth Packrone	0:06:00	Billable	Strategy session with B. Kitchelt re: standing arguments about membership
7/29/2016	Seth Packrone	0:54:00	Billable	Read, take notes, and analyze Blunt decision
7/29/2016	Seth Packrone	0:18:00	Billable	Research potential organizational plaintiff re: facts relevant for membership standing
7/29/2016	Seth Packrone	0:06:00	Billable	Strategy session with B. Kitchelt re: standing arguments
7/29/2016	Seth Packrone	0:06:00	Billable	Teleconference with R. Livengood re: weekly meeting
7/29/2016	Seth Packrone	0:30:00	Billable	Teleconference with R. Livengood re: legal strategy for NJ DOC case

7/29/2016	Seth Packrone	0:06:00	Billable	Strategy session with B. Kitchel re: standing for potential organizational plaintiff
7/29/2016	Seth Packrone	0:06:00	Billable	Strategy session with B. Kitchel re: comp ed claims
7/29/2016	Seth Packrone	0:06:00	Billable	Send co-counsel information re: potential organizational plaintiff
8/1/2016	Seth Packrone	0:12:00	Billable	Read and analyze OPRA responses from NJ DOC
8/1/2016	Seth Packrone	0:12:00	Billable	Read and analyze legal research from ACLU-NJ
8/1/2016	Seth Packrone	0:06:00	Billable	Follow up with Bill Silverman re: meeting to discuss NJ DOC investigation
8/1/2016	Seth Packrone	0:06:00	Billable	Follow up with potential organizational plaintiff re: contact from NJ DOC
8/2/2016	Mary-Lee Smith	0:30:00	Billable	Work session with S.Packrone re call on Friday, OPRA responses and standing
8/2/2016	Mary-Lee Smith	0:30:00	Billable	Review memo re org and assoc. standing from ACLU; take notes and draft comments/questions re same
8/2/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: next steps in NJ DOC investigation
8/2/2016	Seth Packrone	0:06:00	Billable	Teleconference with client re: grievance
8/2/2016	Seth Packrone	0:06:00	Billable	Update M. Smith re: call with client
8/2/2016	Seth Packrone	0:06:00	Billable	Prepare for call with M. Smith re: next steps in NJ DOC investigation
8/2/2016	Seth Packrone	0:18:00	Billable	Read and analyze documents from NJ DOC_DOE OPRA response
8/2/2016	Seth Packrone	0:24:00	Billable	Teleconference with M. Smith re: next steps in NJ DOC investigation
8/2/2016	Seth Packrone	0:06:00	Billable	Update Bill Silverman re: next steps in NJ DOC investigation
8/2/2016	Seth Packrone	0:24:00	Billable	Read and analyze standing memo from ACLU-NJ
8/2/2016	Seth Packrone	0:06:00	Billable	Update M. Caiola on NJ DOC investigation
8/2/2016	Seth Packrone	0:24:00	Billable	Update ACLU-NJ re: next steps in NJ DOC investigation
8/2/2016	Seth Packrone	0:06:00	Billable	Update B. Kitchelt on call with client
8/2/2016	Seth Packrone	0:12:00	Billable	Give directions to C. Molholm re: case law on standing in Third Circuit
8/2/2016	Seth Packrone	0:12:00	Billable	Teleconference with client re: releases
8/2/2016	Seth Packrone	0:12:00	Billable	Update litigation team re: call with client
8/2/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: case law around standing in Third Circuit
8/2/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: standing issues in NJ DOC investigation
8/3/2016	Seth Packrone	0:18:00	Billable	Teleconference with impacted organization re: update on NJ DOC investigation
8/3/2016	Seth Packrone	0:06:00	Billable	Update R. Livengood re: call with impacted organization
8/3/2016	Seth Packrone	0:06:00	Billable	Give directions to B. Kitchelt re: next steps for NJ DOC assignments
8/3/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: standing law
8/3/2016	Seth Packrone	0:12:00	Billable	Follow up with contact at school district re: client records
8/3/2016	Seth Packrone	0:06:00	Billable	Teleconference with Public School re: potential client's records
8/3/2016	Seth Packrone	0:06:00	Billable	Strategy session with B. Kitchelt re: next steps in requesting records
8/3/2016	Seth Packrone	0:12:00	Billable	Get update from B. Kitchelt re: legal research on NJ DOC and complaint drafting
8/3/2016	Seth Packrone	0:24:00	Billable	Draft update letter for potential client #1
8/3/2016	Seth Packrone	0:24:00	Billable	Draft update letter for potential client #2
8/3/2016	Seth Packrone	0:06:00	Billable	Send updates and letter to M. Smith
8/4/2016	Mary-Lee Smith	0:12:00	Billable	Call with S.Packrone re strategy for federal or state court
8/4/2016	Michelle Caiola	0:06:00	Billable	strategy session with SP re filing state/federal court
8/4/2016	Michelle Caiola	0:06:00	Billable	update from SP re client call

8/4/2016	Michelle Caiola	0:06:00	Billable	next steps with SP
8/4/2016	Seth Packrone	0:06:00	Billable	Update letters to potential clients 1 and 2
8/4/2016	Seth Packrone	0:12:00	Billable	Draft agenda for co-counsel meeting
8/4/2016	Seth Packrone	0:06:00	Billable	Strategy session with M. Caiola re: next steps for NJ DOC investigation
8/4/2016	Seth Packrone	0:06:00	Billable	Send materials for co-counsel meeting to M. Smith
8/4/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: next steps for NJ DOC
8/4/2016	Seth Packrone	0:12:00	Billable	Send materials and update to ACLU-NJ
8/4/2016	Seth Packrone	0:12:00	Billable	Teleconference with M. Smith re: federal vs. state court
8/4/2016	Seth Packrone	0:12:00	Billable	Strategy session with M. Caiola re: federal and state court
8/4/2016	Seth Packrone	0:18:00	Billable	Draft federal vs. state court issues
8/4/2016	Seth Packrone	0:12:00	Billable	Follow up with Jeanne LoCicero and Bill Silverman re: next week's meeting
8/4/2016	Seth Packrone	0:12:00	Billable	Strategy session with B. Kitchel re: next steps for client section of complaint
8/4/2016	Seth Packrone	0:06:00	Billable	Update litigation team re: client update
8/5/2016	Mary-Lee Smith	1:00:00	Billable	Work session with ACLU and lit team re intakes, federal v. state court, doc review, etc
8/5/2016	Mary-Lee Smith	0:36:00	Billable	Review and revise questionnaire for impacted organization
8/5/2016	Michelle Caiola	0:12:00	Billable	update from SP re fed v. state issue
8/5/2016	Seth Packrone	0:24:00	Billable	Read, analyze, and compile notes on OPRA Response #1 to DOC_DOE request
8/5/2016	Seth Packrone	0:06:00	Billable	Read, analyze, and compile notes on OPRA Response #2 to DOC_DOE request
8/5/2016	Seth Packrone	0:54:00	Billable	Read and analyze OPRA Response #3 to DOC_DOE request
8/5/2016	Seth Packrone	0:18:00	Billable	Final strategy session re: client records and legal research with B. Kitchelt
8/5/2016	Seth Packrone	0:36:00	Billable	Compile notes from OPRA Response #3 to DOC_DOE request
8/5/2016	Seth Packrone	0:12:00	Billable	Send OPRA requests update to litigation team
8/5/2016	Seth Packrone	0:06:00	Billable	Teleconference with impacted organization re: update on NJ DOC investigation
8/5/2016	Seth Packrone	0:12:00	Billable	Prepare for call with co-counsel re: legal strategy
8/5/2016	Seth Packrone	0:42:00	Billable	Teleconference with co-counsel, R. Livengood and J. LoCicero, M. Smith, B. Kitchelt re: legal strategy decisions
8/5/2016	Seth Packrone	0:06:00	Billable	Teleconference with M. Smith re: letters to clients
8/5/2016	Seth Packrone	0:06:00	Billable	Correspond with Bill Silverman and Jeanne LoCicero re: upcoming meeting
8/5/2016	Seth Packrone	0:06:00	Billable	Teleconference with client re: next steps in investigation
8/5/2016	Seth Packrone	0:06:00	Billable	Update litigation team re: call with client
8/8/2016	Mary-Lee Smith	0:24:00	Billable	Review agenda for Proskauer meeting and tasklist for same; provide feedback to S.Packrone
8/8/2016	Mary-Lee Smith	0:12:00	Billable	Review client update letter re same; provide feedback
8/8/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: B. Kitchelt's legal research memos
8/8/2016	Seth Packrone	0:18:00	Billable	Draft agenda for meeting with Proskauer
8/8/2016	Seth Packrone	0:18:00	Billable	Redraft research task list for Proskauer Rose
8/8/2016	Seth Packrone	0:12:00	Billable	Prepare for tomorrow's meeting with Bill Silverman
8/8/2016	Seth Packrone	0:18:00	Billable	Update M. Smith re: plan for meeting with Proskauer
8/8/2016	Seth Packrone	0:12:00	Billable	Draft letter to client re: update on investigation
8/8/2016	Seth Packrone	0:06:00	Billable	Give J. Mukherjee directions re: sending letters to NJDOC clients
8/8/2016	Seth Packrone	0:06:00	Billable	Finalize agenda and task list for meeting with Proskauer

8/8/2016	Seth Packrone	0:12:00	Billable	Send materials for meeting with Proskauer to ACLU
8/8/2016	Seth Packrone	0:18:00	Billable	Read, analyze, and comment on impacted organization questionnaire
8/8/2016	Seth Packrone	0:12:00	Billable	Send update to M. Smith re: impacted organization interview
8/8/2016	Seth Packrone	0:06:00	Billable	Teleconference with client re: updated on investigation
8/8/2016	Seth Packrone	0:06:00	Billable	Read and analyze documents from impacted organization re: potential clients
8/8/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: client letters
8/8/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: impacted organization standing and interview
8/8/2016	Seth Packrone	0:18:00	Billable	Correspond with litigation team re: questions for impacted organization and organizational standing
8/8/2016	Seth Packrone	0:12:00	Billable	Correspond with ACLU re: next steps in NJ DOC investigation
8/8/2016	Seth Packrone	0:12:00	Billable	Update M. Caiola re: next steps in NJ DOC investigation
8/8/2016	Seth Packrone	0:12:00	Billable	Strategy session with J. Mukherjee re: sending letter to client
8/8/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: changes to Proskauer agenda
8/9/2016	Mary-Lee Smith	0:12:00	Billable	Call with S.Packrone to discuss revised agenda for Proskauer meeting
8/9/2016	Mary-Lee Smith	1:06:00	Billable	Strategy session with pro bono counsel and lit team re class cert, etc
8/9/2016	Mary-Lee Smith	0:12:00	Billable	Call with S.Packrone re meeting with Proskauer and co-counsel agreement with same
8/9/2016	Michelle Caiola	0:12:00	Billable	update from SP post meeting with Bill Silverman
8/9/2016	Michelle Caiola	0:12:00	Billable	direct SP re topics to discuss and update post aclu call
8/9/2016	Seth Packrone	0:12:00	Billable	Revise agenda for Proskauer meeting
8/9/2016	Seth Packrone	0:12:00	Billable	Send new agenda to ACLU-NJ
8/9/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: agenda for Proskauer meeting
8/9/2016	Seth Packrone	0:12:00	Billable	Strategy session with M. Caiola re: upcoming call with co-counsel
8/9/2016	Seth Packrone	0:06:00	Billable	Prepare for call with ACLU-NJ
8/9/2016	Seth Packrone	0:12:00	Billable	Teleconference with ACLU re: agenda for Proskauer meeting
8/9/2016	Seth Packrone	0:12:00	Billable	Update M. Smith re: call with with ACLU
8/9/2016	Seth Packrone	0:06:00	Billable	Teleconference with M. Smith re: agenda for Proskauer meeting
8/9/2016	Seth Packrone	0:30:00	Billable	Teleconference with R. Livengood, J. LoCicero, and M. Smith re: agenda for Proskauer call
8/9/2016	Seth Packrone	0:06:00	Billable	Teleconference with M. Smith re: editing agenda
8/9/2016	Seth Packrone	0:12:00	Billable	Revise plan for Proskauer
8/9/2016	Seth Packrone	0:06:00	Billable	Send agenda/task list to ACLU
8/9/2016	Seth Packrone	0:06:00	Billable	Give J. Mukherjee directions re: setting up legal call with client
8/9/2016	Seth Packrone	0:06:00	Billable	Follow up with A. Rogers and R. Livengood re: contacting prison about client call
8/9/2016	Seth Packrone	0:06:00	Billable	Prepare for meeting with potential pro bono counsel at Proskauer Rose
8/9/2016	Seth Packrone	0:06:00	Billable	Give J. Mukherjee directison re: setting up client call
8/9/2016	Seth Packrone	0:06:00	Billable	Teleconference with J. Mukherjee re: setting up attorney call at DOC facility
8/9/2016	Seth Packrone	1:00:00	Billable	Conference with Bill Silverman and Harry Frischer from Proskauer Rose, Jeanne LoCicero from ACLU-NJ, and M. Smith re: case strategy and co-counsel agreement
8/9/2016	Seth Packrone	0:12:00	Billable	Strategy session with J. LoCicero re: next steps with Proskauer and for drafting the complaint
8/9/2016	Seth Packrone	0:12:00	Billable	Travel to meeting at Proskauer (20 minutes in total; bill half)
8/9/2016	Seth Packrone	0:12:00	Billable	Send M. Smith update re: next steps with Proskauer
8/9/2016	Seth Packrone	0:06:00	Billable	Teleconference with J. Mukherjee re: edits to letter to DOC facility

8/9/2016	Seth Packrone	0:12:00	Billable	Edit letter to DOC facility for call with client
8/9/2016	Seth Packrone	0:12:00	Billable	Teleconference with M. Smith re: next steps for NJ DOC investigation
8/10/2016	Michelle Caiola	0:12:00	Billable	ACLU and co-counsel meeting update from SP
8/10/2016	Seth Packrone	0:06:00	Billable	Update M. Caiola re: meeting with Proskauer Rose
8/10/2016	Seth Packrone	0:06:00	Billable	Give J. Mukherjee directions re: fielding calls from clients
8/10/2016	Seth Packrone	0:18:00	Billable	Finalize update letters for potential client 1 and potential client 2 based on ACLU's feedback
8/10/2016	Seth Packrone	0:06:00	Billable	Give J. Mukherjee directions re: letters for NJ DOC investigation
8/10/2016	Seth Packrone	0:06:00	Billable	Read and analyze potential client's records
8/10/2016	Seth Packrone	0:12:00	Billable	Read and analyze legal arguments for DOC as an LEA
8/10/2016	Seth Packrone	0:06:00	Billable	Teleconference with DOC facility re: call with client
8/10/2016	Seth Packrone	0:06:00	Billable	Follow up with ACLU-NJ re: DOC facility policy on attorney calls
8/10/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: next steps with Proskauer
8/10/2016	Seth Packrone	0:18:00	Billable	Teleconference with impacted organization re: update on investigation
8/10/2016	Seth Packrone	0:18:00	Billable	Read and analyze legal research on Child Find and Exhaustion
8/10/2016	Seth Packrone	0:06:00	Billable	Read and analyze B. Kitchelt's memo on exhaustion in Third Circuit
8/11/2016	Mary-Lee Smith	0:12:00	Billable	Review ACLU meeting agenda
8/11/2016	Seth Packrone	0:12:00	Billable	Outline and create work plan for drafting complaint
8/11/2016	Seth Packrone	0:12:00	Billable	Draft agenda for co-counsel call with ACLU
8/11/2016	Seth Packrone	0:06:00	Billable	Update M. Smith re: status of each client
8/11/2016	Seth Packrone	0:12:00	Billable	Teleconference with client re: update on investigation status
8/11/2016	Seth Packrone	0:12:00	Billable	Teleconference with DOC facility re: attorney call
8/11/2016	Seth Packrone	0:06:00	Billable	Teleconference with DOC Facility Admin. re: client call
8/11/2016	Seth Packrone	0:06:00	Billable	Teleconference with DOC facility Admin re: client call
8/11/2016	Seth Packrone	0:18:00	Billable	Teleconference with client re: update on investigation process
8/11/2016	Seth Packrone	0:12:00	Billable	Update M. Smith re: calls with clients
8/11/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: call with ACLU tomorrow
8/11/2016	Seth Packrone	0:06:00	Billable	Correspond with ACLU re: OPRA response and agenda for next meeting
8/12/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: today's co-counsel meeting
8/12/2016	Seth Packrone	0:12:00	Billable	Read and analyze B. Kitchelt's rough draft of client section of complaint
8/12/2016	Seth Packrone	0:42:00	Billable	Teleconference with J. LoCicero and R. Livengood re: next steps in NJ DOC investigation
8/12/2016	Seth Packrone	0:06:00	Billable	Correspond with updates for ACLU re: client calls
8/12/2016	Seth Packrone	0:12:00	Billable	Teleconference with M. Smith re: update on meeting
8/12/2016	Seth Packrone	0:06:00	Billable	Teleconference with client's parent re: update
8/21/2016	Seth Packrone	0:12:00	Billable	Track correspondence re: next steps in NJDOC case
8/22/2016	Mary-Lee Smith	0:18:00	Billable	Call with S. Packrone re NJ DOC intakes
8/22/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: next steps for investigation
8/22/2016	Seth Packrone	0:06:00	Billable	Follow up with R. Livengood re: plaintiff contact information
8/22/2016	Seth Packrone	0:06:00	Billable	Research PLRA as it applies to ADA claims
8/22/2016	Seth Packrone	0:06:00	Billable	Give directions to J. Mukherjee re: contacting DOC facility for client calls

8/22/2016	Seth Packrone	0:18:00	Billable	Teleconference with impacted organization re: contact information for NJ DOC plaintiffs
8/22/2016	Seth Packrone	0:12:00	Billable	Teleconference with R. Livengood re: update on clients and potential clients
8/22/2016	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: update on client and complaint drafting process
8/22/2016	Seth Packrone	0:06:00	Billable	Create task list for complaint drafting
8/22/2016	Seth Packrone	0:06:00	Billable	Teleconference with M. Smith re: next steps in NJ DOC investigation
8/22/2016	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: client update and complaint meeting
8/22/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: Third Circuit case law on exhaustion
8/23/2016	Seth Packrone	0:30:00	Billable	Read and analyze Haddon Heights case on exhaustion in Third Circuit
8/23/2016	Seth Packrone	0:12:00	Billable	Write up research on exhaustion from Haddon Heights case
8/23/2016	Seth Packrone	0:24:00	Billable	Research NJ Law Against Discrimination and its application to disability-related discrimination
8/23/2016	Seth Packrone	0:06:00	Billable	Give directions to J. Mukherjee re: attorney call with client
8/23/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: Hadden and client retainer
8/23/2016	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood and J. LoCicero re: exhaustion in 3rd Circuit
8/23/2016	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: client retainer
8/23/2016	Seth Packrone	0:06:00	Billable	Revise and edit legal call request
8/23/2016	Seth Packrone	0:06:00	Billable	Teleconference with S. Wolinsky re: NJLAD's application to NJ DOC case
8/23/2016	Seth Packrone	0:24:00	Billable	Teleconference with R. Livengood re: strategy for drafting complaint
8/23/2016	Seth Packrone	0:06:00	Billable	Follow up with impacted organization and R. Livengood re: meeting about complaint
8/23/2016	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: complaint drafting strategy and timeline
8/23/2016	Seth Packrone	0:12:00	Billable	Teleconference with client re: update on investigation
8/23/2016	Seth Packrone	0:12:00	Billable	Update litigation team on call with client
8/24/2016	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood and impacted organization re: background information on impacted organization for complaint
8/24/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: co-counsel call plan
8/24/2016	Seth Packrone	0:06:00	Billable	Strategy session with M. Caiola re: next meeting with clients
8/24/2016	Seth Packrone	0:12:00	Billable	Strategy session with C. Molholm re: preparation for next client meeting
8/24/2016	Seth Packrone	0:18:00	Billable	Teleconference with client re: update on investigation
8/24/2016	Seth Packrone	0:12:00	Billable	Strategy session with C. Molholm re: follow up on client call
8/25/2016	Seth Packrone	0:18:00	Billable	Review and analyze new list of potential intakes from impacted organization
8/25/2016	Seth Packrone	0:06:00	Billable	Follow up with R. Livengood re: communications with clients at DOC facility
8/25/2016	Seth Packrone	0:12:00	Billable	Follow up with litigation team re: co-counsel meetings moving forward
8/26/2016	Seth Packrone	0:06:00	Billable	Correspond with impacted organization re: new potential client
8/26/2016	Seth Packrone	0:06:00	Billable	Teleconference with client re: update on investigation
8/26/2016	Seth Packrone	0:12:00	Billable	Teleconference with impacted organization re: update on intake process
8/26/2016	Seth Packrone	0:06:00	Billable	Update litigation team re: call with client
8/29/2016	Michelle Caiola	0:12:00	Billable	arrange plan and staffing for prison visits
8/29/2016	Seth Packrone	0:12:00	Billable	Strategy session with M. Caiola re: staffing and scheduling issues for case
8/29/2016	Seth Packrone	0:06:00	Billable	TC with client re: update on investigation
8/29/2016	Seth Packrone	0:12:00	Billable	Follow up with M. Smith re: next steps in NJ DOC investigation
8/29/2016	Seth Packrone	0:06:00	Billable	Give directions to C. Molholm re: Wednesday's client visits

8/29/2016	Seth Packrone	0:06:00	Billable	Give directions to J. Mukherjee re: setting up visits with clients
8/29/2016	Seth Packrone	0:12:00	Billable	Edit and finalize letters to prison to set up visits
8/29/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: visits with clients
8/29/2016	Seth Packrone	0:06:00	Billable	Send visit request to DOC facility for client
8/29/2016	Seth Packrone	0:12:00	Billable	Update ACLU re: visit with clients and meeting with Proskauer
8/29/2016	Seth Packrone	0:12:00	Billable	Prepare for visits with clients
8/30/2016	Michelle Caiola	0:12:00	Billable	scheduling with SP re prison visits and with paralegals
8/30/2016	Seth Packrone	0:12:00	Billable	Correspond with co-counsel re: upcoming meetings with clients
8/30/2016	Seth Packrone	0:06:00	Billable	Follow up with Proskauer re: meeting to discuss NJ DOC legal research
8/30/2016	Seth Packrone	0:18:00	Billable	Update letters to NJDOC for inmate visits
8/30/2016	Seth Packrone	0:06:00	Billable	Update M. Smith re: client visits
8/30/2016	Seth Packrone	0:06:00	Billable	TC with client family member re: update on client situation
8/30/2016	Seth Packrone	0:12:00	Billable	Correspond with R. Llivengood re: upcoming client visits
8/30/2016	Seth Packrone	0:06:00	Billable	Strategy session with C. Molholm re: preparing for client visits tomorrow
8/30/2016	Seth Packrone	0:12:00	Billable	Strategy session with C. Molholm re: client visit
8/30/2016	Seth Packrone	0:12:00	Billable	Teleconference with admin from DOC facility re: client visit
8/30/2016	Seth Packrone	0:12:00	Billable	Give directions to C. Molholm re: tomorrow's client visit
8/30/2016	Seth Packrone	0:06:00	Billable	Update litigation team re: visits with clients
8/30/2016	Seth Packrone	0:06:00	Billable	TC with DOC facility Administrator re: visit with client
8/30/2016	Seth Packrone	0:06:00	Billable	Update paralegals on procedures for scheduling NJ DOC inmate visits
8/30/2016	Seth Packrone	0:06:00	Billable	Evaluate intakes shared by impacted organization
8/30/2016	Seth Packrone	0:12:00	Billable	Draft agenda for co-counsel call with ACLU
8/30/2016	Seth Packrone	0:06:00	Billable	Give directions to C. Molholm re: prep for visit with clients
8/30/2016	Seth Packrone	0:06:00	Billable	Prepare for meeting with client
8/30/2016	Seth Packrone	0:12:00	Billable	Correspond with R. Livengood re: plan for drafting the complaint
8/31/2016	Seth Packrone	0:06:00	Billable	Send co-counsel agenda to M. Smith
8/31/2016	Seth Packrone	0:24:00	Billable	Update C. Molholm re: plan and agenda for meeting with client
8/31/2016	Seth Packrone	1:24:00	Billable	Travel to prisons to visit with clients (165 minutes total, bill for half)
8/31/2016	Seth Packrone	0:12:00	Billable	Give directions to C. Molholm re: next steps after client visit
8/31/2016	Seth Packrone	0:18:00	Billable	Check in process at DOC facility
8/31/2016	Seth Packrone	0:12:00	Billable	Prepare for meeting with client 1
8/31/2016	Seth Packrone	0:30:00	Billable	Read and analyze B. Kitchelt's notes on inmate handbooks from NJ DOC facilities (Garden State, Mountainview, and Wagner)
8/31/2016	Seth Packrone	0:12:00	Billable	Read and analyze B. Kitchelt's notes on inmate handbooks from NJ DOC facilities (NJSP)
8/31/2016	Seth Packrone	1:18:00	Billable	Visit with client 1 at DOC facility re: grievance process and complaint
8/31/2016	Seth Packrone	0:06:00	Billable	Update M. Smith on meeting with client 1
9/2/2016	Mary-Lee Smith	0:42:00	Billable	Work session with ACLU re intakes and complaint
9/2/2016	Seth Packrone	0:06:00	Billable	Correspond with R Livengood re: update on client
9/2/2016	Seth Packrone	0:06:00	Billable	Research transition services under IDEA in adult correctional facilities
9/2/2016	Seth Packrone	0:06:00	Billable	Update M. Smith re: transition services in NJDOC facilities

9/2/2016	Seth Packrone	0:06:00	Billable	Prepare for co-counsel meeting re: update on clients
9/2/2016	Seth Packrone	0:12:00	Billable	Strategy session with M. Smith re: next steps in case
9/2/2016	Seth Packrone	0:30:00	Billable	Teleconference with M. Smith and co-counsel ACLU-NJ (R. Livengood and J. LoCicero)
9/2/2016	Seth Packrone	0:42:00	Billable	Correspond with M. Smith re: update on client status and client records
9/2/2016	Seth Packrone	0:12:00	Billable	Analyze new client records from NJ DOC
9/2/2016	Seth Packrone	0:18:00	Billable	Redraft complaint timeline with internal deadlines
9/2/2016	Seth Packrone	0:12:00	Billable	Update M. Smith re: internal deadlines for complaint
9/2/2016	Seth Packrone	0:12:00	Billable	Read and analyze B. Kitchelt memo on facility handbooks
9/2/2016	Seth Packrone	0:06:00	Billable	Send handbook memo and notes to litigation team
9/6/2016	Seth Packrone	0:12:00	Billable	Analyze ACLU's findings from OPRA responses 4-5 re: NJ DOC-DOE correspondence
9/6/2016	Seth Packrone	0:06:00	Billable	Correspond with C. Molholm re: updating spreadsheet tracking intakes
9/6/2016	Seth Packrone	0:06:00	Billable	Read and analyze ACLU's summaries of NJ DOC-DOE OPRA responses 4-5
9/6/2016	Seth Packrone	0:12:00	Billable	Read and analyze ACLU's draft of client 3 section of complaint
9/7/2016	Mary-Lee Smith	0:48:00	Billable	Review/take notes on documents received from DOE
9/7/2016	Seth Packrone	0:06:00	Billable	Correspond with C. Molholm re: updating spreadsheet tracking intakes
9/7/2016	Seth Packrone	0:12:00	Billable	Research and analyze Title I Part D from ESEA
9/8/2016	Seth Packrone	0:18:00	Billable	Correspond with M. Smith re: next steps in OPRA review and Title I Part D programs
9/8/2016	Seth Packrone	0:12:00	Billable	Research and analyze Title I Part D from ESEA
9/8/2016	Seth Packrone	0:36:00	Billable	Outline Section 504 and ADA sections of complaint
9/8/2016	Seth Packrone	1:36:00	Billable	Rough draft of ADA section of complaint
9/8/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: strategy for reviewing OPRA documents
9/8/2016	Seth Packrone	0:06:00	Billable	Follow up with litigation team re: meeting with Proskauer Rose
9/9/2016	Mary-Lee Smith	0:42:00	Billable	Work session with ACLU re intakes and complaint status
9/9/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: Proskauer meeting
9/9/2016	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: Proskauer meeting
9/9/2016	Seth Packrone	0:30:00	Billable	Teleconference with litigation team (M. Smith, R. Livengood, and J. LoCicero) re: next steps in investigation
9/9/2016	Seth Packrone	0:06:00	Billable	Strategy session with M. Smith re: complaint drafting next steps
9/9/2016	Seth Packrone	0:12:00	Billable	Correspond with impacted organization re: communications with members
9/9/2016	Seth Packrone	0:06:00	Billable	Teleconference with M. Caiola re: staffing moving forward
9/9/2016	Seth Packrone	0:06:00	Billable	Strategy session with J. Mukherjee re: status of records requests
9/9/2016	Seth Packrone	1:06:00	Billable	Draft rough draft of Section 504 section of complaint
9/10/2016	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: co-counsel meeting with pro bono partners
9/12/2016	Michelle Caiola	0:12:00	Billable	strategy session with SP re staffing
9/12/2016	Seth Packrone	0:06:00	Billable	Correspond with impacted organization re: client communications
9/12/2016	Seth Packrone	0:12:00	Billable	Strategy session with M. Caiola re: staffing moving forward
9/12/2016	Seth Packrone	1:06:00	Billable	Revise and edit ADA and Section 504 sections of complaint
9/12/2016	Seth Packrone	0:18:00	Billable	Send rough draft of complaint with notes to M. Smith for edits
9/12/2016	Seth Packrone	0:06:00	Billable	Correspond with J. Mukherjee re: records requests from NJ DOC
9/12/2016	Seth Packrone	0:06:00	Billable	Teleconference with co-counsel R. Livengood re: next visits with clients

9/13/2016	Seth Packrone	0:06:00	Billable	Outline client 2 section of complaint
9/13/2016	Seth Packrone	0:18:00	Billable	Teleconference with R. Livengood re: visits with several clients
9/13/2016	Seth Packrone	0:06:00	Billable	Give instructions to J. Mukherjee to set up visit at DOC facility
9/13/2016	Seth Packrone	1:12:00	Billable	Read and analyze client 2's educational documents
9/13/2016	Seth Packrone	1:48:00	Billable	Draft factual sections of client 2's section of complaint
9/13/2016	Seth Packrone	0:12:00	Billable	Give directions to J. Mukherjee re: visit request at DOC facility
9/13/2016	Seth Packrone	0:36:00	Billable	Teleconference with impacted organization re: communications with clients
9/13/2016	Seth Packrone	0:06:00	Billable	Update M. Smith re: social media issues for case
9/13/2016	Seth Packrone	0:48:00	Billable	Revise and edit client 2 section of complaint
9/14/2016	Mary-Lee Smith	0:18:00	Billable	Begin revising DOC complaint: legal claims sections
9/14/2016	Mary-Lee Smith	0:24:00	Billable	Continue revising DOC complaint: legal claims sections
9/14/2016	Mary-Lee Smith	0:18:00	Billable	Call with Proskauer and lit team re assignments for Proskauer and status of case
9/14/2016	Mary-Lee Smith	0:18:00	Billable	Work session with S.Packrone re reorganization of ADA/504 sections of complaint
9/14/2016	Michelle Caiola	0:12:00	Billable	update from SP re meetings
9/14/2016	Michelle Caiola	0:12:00	Billable	discuss complaint drafting strategy with SP
9/14/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith and J. Flores re: assignments for NJDOC investigation
9/14/2016	Seth Packrone	0:42:00	Billable	Draft rough draft of client 1 section of complaint on disability background
9/14/2016	Seth Packrone	0:12:00	Billable	Read and analyze medical records for client
9/14/2016	Seth Packrone	0:48:00	Billable	Draft first draft of client section of complaint on education and administration segregation
9/14/2016	Seth Packrone	0:12:00	Billable	Read and analyze client's educational records
9/14/2016	Seth Packrone	0:12:00	Billable	Teleconference with client re: update on investigation
9/14/2016	Seth Packrone	0:12:00	Billable	Update M. Smith re: call with client
9/14/2016	Seth Packrone	0:12:00	Billable	Prepare for meeting with Proskauer
9/14/2016	Seth Packrone	0:18:00	Billable	Strategy session with R. Livengood, J. LoCicero, B. Silverman, and M. Smith and Proskauer team
9/14/2016	Seth Packrone	0:12:00	Billable	Follow up teleconference with M. Smith re: next steps in complaint drafting
9/14/2016	Seth Packrone	0:18:00	Billable	Send update with updated complaint to ACLU
9/15/2016	Seth Packrone	0:12:00	Billable	Teleconference with J. Flores and J. Mukherjee re: updating intake spreadsheet based on client documents
9/15/2016	Seth Packrone	0:06:00	Billable	Draft agenda for co-counsel meeting with ACLU
9/15/2016	Seth Packrone	0:06:00	Billable	Send impacted organization question edits to R. Livengood from ACLU
9/15/2016	Seth Packrone	0:12:00	Billable	Prepare for meeting with client at DOC facility
9/15/2016	Seth Packrone	0:06:00	Billable	Update M. Smith re: complaint and agenda
9/16/2016	Mary-Lee Smith	1:12:00	Billable	Review complaint (plaintiffs sections)
9/16/2016	Mary-Lee Smith	1:00:00	Billable	Call with ACLU and S.Packrone re clients, complaint drafting, media plan, and demand letter
9/16/2016	Seth Packrone	0:18:00	Billable	Edit client 2 section of complaint
9/16/2016	Seth Packrone	0:18:00	Billable	Edit and revise client 1 section of complaint
9/16/2016	Seth Packrone	0:24:00	Billable	Reorganize Section 504 and ADA sections of complaint
9/16/2016	Seth Packrone	0:30:00	Billable	Edit and revise legal sections and client sections of complaint
9/16/2016	Seth Packrone	0:06:00	Billable	Send complaint with comments to M. Smith
9/16/2016	Seth Packrone	0:06:00	Billable	Send ACLU agenda for meeting with comments

9/16/2016	Seth Packrone	0:42:00	Billable	Travel to DOC facility for meeting with client (1.4 - bill half)
9/16/2016	Seth Packrone	0:24:00	Billable	Check in and wait at DOC facility
9/16/2016	Seth Packrone	0:18:00	Billable	Draft follow up questions to fact check complaint with client
9/16/2016	Seth Packrone	1:18:00	Billable	Meet with client at DOC facility
9/16/2016	Seth Packrone	1:00:00	Billable	Teleconference with M. Smith, J. LoCicero, and R. Livengood re: next steps for drafting complaint and timing of filing
9/16/2016	Seth Packrone	0:12:00	Billable	Travel back from DOC facility, legislative team call (total time 25 min; bill half)
9/19/2016	Mary-Lee Smith	2:54:00	Billable	Revise complaint: redline and review GF papers, esp MTD, to further revise
9/19/2016	Mary-Lee Smith	0:42:00	Billable	Review GF materials further in prep for revising complaint
9/19/2016	Michelle Caiola	0:18:00	Billable	update from SP re client interview, next steps, staffing for work on tap
9/19/2016	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: call to update Proskauer on DOE research
9/19/2016	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: meetings with Proskauer this week regarding DOE research and OPRA response review
9/19/2016	Seth Packrone	0:18:00	Billable	Update M. Caiola re: staffing needs for case moving forward and media strategy
9/19/2016	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood and review new draft of complaint timeline
9/19/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: plan for meeting with Proskauer
9/19/2016	Seth Packrone	0:06:00	Billable	Correspond with Proskauer re: OPRA documents to review for Friday's meeting
9/19/2016	Seth Packrone	0:12:00	Billable	Teleconference with client re: update on status of investigation
9/19/2016	Seth Packrone	0:18:00	Billable	Teleconference with Proskauer team and R. Livengood re: researching causes of action against NJ DOE to include in complaint under federal and state law
9/19/2016	Seth Packrone	0:12:00	Billable	Teleconference with R. Livengood re: update on client call and cataloging OPRA responses
9/19/2016	Seth Packrone	0:06:00	Billable	Read and analyze M. Smith's comments on client section of complaint
9/19/2016	Seth Packrone	0:06:00	Billable	First draft of introduction section of ADA, Section 504, and IDEA overview section of complaint
9/19/2016	Seth Packrone	0:18:00	Billable	Update M. Smith re: drafting ADA/Section/IDEA framework section of complaint, call with client, and status of OPRA responses
9/19/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: her edits to the complaint ADA/Section 504 sections
9/20/2016	Mary-Lee Smith	0:18:00	Billable	Call with S. Packrone re legal theories to include in complaint
9/20/2016	Mary-Lee Smith	0:54:00	Billable	Complete reviewing and taking notes on GF MTD briefing; develop arguments to include/avoid in complaint
9/20/2016	Mary-Lee Smith	0:06:00	Billable	Email to J. LeCicero re call with Proskauer; email to Proskauer re same
9/20/2016	Mary-Lee Smith	2:24:00	Billable	Work on revising NJDOC complaint -- client sections and review of GF materials where needed
9/20/2016	Mary-Lee Smith	1:54:00	Billable	Continue revision of complaint -- ADA and 504 sections
9/20/2016	Seth Packrone	0:12:00	Billable	Outline IDEA cause of action section of complaint
9/20/2016	Seth Packrone	0:30:00	Billable	Research and write first draft of section of complaint re: DOC as local education agency
9/20/2016	Seth Packrone	0:24:00	Billable	Research and write first draft of section of complaint re: IDEA in adult correctional facilities
9/20/2016	Seth Packrone	0:24:00	Billable	Research and write first draft of section of complaint re: DOE as SEA
9/20/2016	Seth Packrone	0:06:00	Billable	Correspond with J. Flores re: updating NJDOC intake spreadsheet
9/20/2016	Seth Packrone	0:24:00	Billable	Outline section first draft of complaint on duties of LEA/SEA under IDEA
9/20/2016	Seth Packrone	0:54:00	Billable	First draft of substantive responsibilities of DOC under IDEA section of complaint
9/20/2016	Seth Packrone	0:30:00	Billable	Teleconference with M. Smith re: IDEA and ADA/Section education allegations in complaint
9/20/2016	Seth Packrone	0:12:00	Billable	Research DOE's oversight responsibilities of DOC under NJ SFEA
9/20/2016	Seth Packrone	0:24:00	Billable	Give directions to J. Flores re: updating intake spreadsheet with upcoming intakes
9/20/2016	Seth Packrone	0:12:00	Billable	Research and analyze Buckley re: modifying student's IEP who presents bona fide security threat
9/20/2016	Seth Packrone	0:18:00	Billable	Draft IDEA sections on continuum of placements and required members at the IEP team meetings

9/21/2016	Mary-Lee Smith	0:48:00	Billable	Email exchange and call with S.Packrone re edits to complaint
9/21/2016	Michelle Caiola	0:12:00	Billable	reporting by SP re next steps toward filing, strategy re same
9/21/2016	Seth Packrone	0:12:00	Billable	Read and analyze M. Smith's comments and edits on client, 504, and ADA sections of complaint
9/21/2016	Seth Packrone	0:18:00	Billable	Teleconference with R. Livengood re: update on third client and ADA allegations in complaint
9/21/2016	Seth Packrone	0:18:00	Billable	Read and analyze Bayside State Prison Handbook re: inmate classifications
9/21/2016	Seth Packrone	0:06:00	Billable	Strategy session with M. Caiola re: filing timeline for complaint
9/21/2016	Seth Packrone	0:12:00	Billable	Read and analyze DOC facility ASCU policies handbook as it relates to mental health for complaint
9/21/2016	Seth Packrone	0:18:00	Billable	Draft responses to M. Smith comments and edits to ADA/Section 504/client sections of complaint
9/21/2016	Seth Packrone	0:12:00	Billable	Draft first draft of short intro sections for clients in complaint
9/21/2016	Seth Packrone	0:18:00	Billable	Input M. Smith's edits on client section into second draft of complaint
9/21/2016	Seth Packrone	0:36:00	Billable	Teleconference with M. Smith re: work through edits to ADA and Section 504 sections of complaint
9/21/2016	Seth Packrone	0:06:00	Billable	Redraft client section of complaint on services at DOC facility
9/21/2016	Seth Packrone	0:12:00	Billable	Teleconference with client re: next visit and update on situation
9/21/2016	Seth Packrone	0:12:00	Billable	Update litigation team on client call
9/21/2016	Seth Packrone	0:06:00	Billable	Read and analyze background information about clients
9/21/2016	Seth Packrone	0:30:00	Billable	Edit client section of complaint re: update it with information from last client interview
9/21/2016	Seth Packrone	0:24:00	Billable	Edit client section of complaint based on M. Smith's comments
9/21/2016	Seth Packrone	0:12:00	Billable	Proofread and edit second draft of ADA/Section 504 sections of complaint
9/21/2016	Seth Packrone	0:06:00	Billable	Prepare for interview with impacted organization for complaint information
9/22/2016	Mary-Lee Smith	0:12:00	Billable	Call with S.Packrone re update on impacted organization
9/22/2016	Mary-Lee Smith	0:18:00	Billable	Follow up call with S.Packrone re impacted organization participation and next steps
9/22/2016	Michelle Caiola	0:06:00	Billable	provide update to SP re M Smith feedback
9/22/2016	Seth Packrone	0:30:00	Billable	Edit second draft of ADA regulations section of complaint
9/22/2016	Seth Packrone	0:42:00	Billable	Edit second draft of Section 504 regs and FAPE section of complaint
9/22/2016	Seth Packrone	0:12:00	Billable	Prepare and send second draft of ADA/Section 504 and client sections of complaint to ACLU-NJ
9/22/2016	Seth Packrone	0:12:00	Billable	Update R. Livengood re: status of records requests sent to DOC for clients
9/22/2016	Seth Packrone	0:18:00	Billable	Prepare and read interview guide for meeting with impacted organization to collect information for complaint
9/22/2016	Seth Packrone	0:06:00	Billable	Strategy session with R. Livengood re: meeting with Proskauer
9/22/2016	Seth Packrone	2:00:00	Billable	Interview with impacted organization with R. Livengood
9/22/2016	Seth Packrone	0:24:00	Billable	Follow up strategy session with R. Livengood and J. LoCicero re: next steps in NJ DOC litigation and timeline for filing
9/22/2016	Seth Packrone	0:24:00	Billable	Travel back from work session in Newark (40 minutes total; bill half)
9/22/2016	Seth Packrone	0:06:00	Billable	Update M. Smith re: plan for Proskauer Rose meeting
9/22/2016	Seth Packrone	0:06:00	Billable	Read and analyze list of facilities that impacted organization has contacted
9/22/2016	Seth Packrone	0:06:00	Billable	Call to M. Smith re: update from work session
9/22/2016	Seth Packrone	0:18:00	Billable	Teleconference with M. Smith re: discovery rules for membership organizations in the Third Circuit
9/23/2016	Mary-Lee Smith	0:12:00	Billable	Review tags for doc coding; make revisiosn/additions
9/23/2016	Michelle Caiola	0:18:00	Billable	update from SP re meetings with impacted organization and path forward
9/23/2016	Seth Packrone	0:18:00	Billable	Strategy session with M. Caiola re: update on impacted organization status
9/23/2016	Seth Packrone	0:06:00	Billable	Teleconference with R. Livengood re: regs for child find

9/23/2016	Seth Packrone	0:06:00	Billable	Research state regs on NJ DOC as LEA
9/23/2016	Seth Packrone	0:36:00	Billable	Read and analyze prima facie case on IDEA/Section 504/ADA
9/23/2016	Seth Packrone	0:24:00	Billable	Work session with R. Livengood re: key words and descriptions for document review of OPRA requests for complaint and discovery
9/23/2016	Seth Packrone	0:12:00	Billable	Update M. Smith re: document orientation with Proskauer and client issues
9/23/2016	Seth Packrone	0:18:00	Billable	Revise and edit first draft of IDEA section of complaint
9/23/2016	Seth Packrone	0:06:00	Billable	Reformat causes of action section of complaint
9/23/2016	Seth Packrone	0:06:00	Billable	Send complaint to M. Smith with comments on next sections due
9/26/2016	Mary-Lee Smith	0:48:00	Billable	Revise intro of complaint for NJDOC
9/26/2016	Michelle Caiola	0:12:00	Billable	update on meeting with co-counsel from SP
9/26/2016	Seth Packrone	0:18:00	Billable	Update spreadsheet tracking intakes based on new information gathered on intakes
9/26/2016	Seth Packrone	0:12:00	Billable	Correspond with R. Livengood re: spreadsheet tracking intakes and new intake
9/26/2016	Seth Packrone	0:06:00	Billable	Send spreadsheet tracking intakes to M. Smith re: for her review and notes on intake process
9/26/2016	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: RHU classroom at DOC facility
9/26/2016	Seth Packrone	0:30:00	Billable	Read and analyze Tustin's ADA analysis and search related 3rd Circuit cases
9/26/2016	Seth Packrone	0:36:00	Billable	Draft first draft of IDEA section of Introduction re: DOC's obligations under IDEA
9/26/2016	Seth Packrone	0:30:00	Billable	Draft first draft of ADA section and DOC's obligations under ADA part of introduction
9/26/2016	Seth Packrone	0:30:00	Billable	Draft first draft of Plaintiffs' factual claims in introduction
9/26/2016	Seth Packrone	0:24:00	Billable	Draft first draft of administrative segregation and relief request section of introduction
9/26/2016	Seth Packrone	0:06:00	Billable	Strategy session with M. Caiola re: update on status of case
9/26/2016	Seth Packrone	0:12:00	Billable	Revise and edit first draft of Introduction section of NJ DOC complaint
9/26/2016	Seth Packrone	0:36:00	Billable	Draft first draft of class allegations section of NJ DOC complaint
9/26/2016	Seth Packrone	0:12:00	Billable	Revise and edit first draft of class allegations section of NJ DOC complaint
9/26/2016	Seth Packrone	0:12:00	Billable	Send first draft of Class allegations and introduction to M. Smith with comments for NJ DOC complaint
9/27/2016	Mary-Lee Smith	0:30:00	Billable	Call with S. Packrone re intro to complaint including discussion of ADA claims
9/27/2016	Mary-Lee Smith	0:54:00	Billable	Revise IDEA and class claims sections of complaint
9/27/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: revisions to IDEA/Intro/Class allegations section of complaint
9/27/2016	Seth Packrone	0:06:00	Billable	Read and analyze NJ DOC policy document regarding provision of health care to inmates
9/27/2016	Seth Packrone	0:06:00	Billable	Read and analyze NJ DOC policy document regarding provision of mental health services to inmates
9/27/2016	Seth Packrone	0:06:00	Billable	Teleconference with R. Livengood re: drafting the complaint and numbers of inmates under 21 in DOC custody
9/27/2016	Seth Packrone	0:36:00	Billable	Get directions from M. Smith re: edits to complaint in the IDEA section and overall legal theory
9/27/2016	Seth Packrone	0:06:00	Billable	Analyze NJ DOC numbers regarding how many inmates are under 21
9/28/2016	Mary-Lee Smith	0:18:00	Billable	Draft intro to NJ DOC complaint outlining legal framework of the case
9/28/2016	Michelle Caiola	0:06:00	Billable	update on complaint drafting from SP
9/28/2016	Seth Packrone	0:06:00	Billable	Read and analyze M. Smith's comments and edits to first draft of IDEA section of complaint
9/28/2016	Seth Packrone	0:18:00	Billable	Edit first draft of Class Allegations section based on M. Smith's comments and research updated demographic numbers for NJ DOC
9/28/2016	Seth Packrone	0:18:00	Billable	Edit first draft of IDEA section of complaint based on M. Smith's comments
9/28/2016	Seth Packrone	0:12:00	Billable	Send first draft of Class allegations and IDEA sections of complaint to R. Livengood with comments re: class definition
9/28/2016	Seth Packrone	0:06:00	Billable	Update M. Caiola re: progress with complaint and next steps
9/28/2016	Seth Packrone	0:06:00	Billable	Follow up with R. Livengood re: following up with impacted organization

9/28/2016	Seth Packrone	0:06:00	Billable	read and analyze documents on background facts of NJ DOC re: mental health/health care provision
9/28/2016	Seth Packrone	0:06:00	Billable	Edit first draft of complaint to send to M. Smith
9/28/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: eligibility criteria allegations under Section 504
9/28/2016	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: legal research on Third Circuit case law around membership information
9/29/2016	Mary-Lee Smith	0:30:00	Billable	Call with impacted organization re approval for participation in litigation
9/29/2016	Mary-Lee Smith	0:18:00	Billable	Work on legal framework section of complaint
9/29/2016	Seth Packrone	0:06:00	Billable	Review and analyze first draft of impacted organization section of complaint
9/29/2016	Seth Packrone	0:06:00	Billable	Review and analyze state law section of complaint
9/29/2016	Seth Packrone	0:06:00	Billable	Teleconference with M. Smith re: prepare for call with impacted organization
9/29/2016	Seth Packrone	0:12:00	Billable	Teleconference with impacted organization re: board approval
9/29/2016	Seth Packrone	0:30:00	Billable	Teleconference with M. Smith and impacted organization re: board and by laws
9/29/2016	Seth Packrone	0:12:00	Billable	Teleconference with M. Smith re: agenda for call with ACLU and timing of filing
9/29/2016	Seth Packrone	0:12:00	Billable	Draft agenda for weekly co-counsel meeting with ACLU
9/29/2016	Seth Packrone	0:06:00	Billable	Send agenda and update on impacted organization meeting to ACLU
9/30/2016	Mary-Lee Smith	1:00:00	Billable	Call with ACLU and S.Packrone re impacted organization, timing of complaint, grievances and legal theories
9/30/2016	Mary-Lee Smith	0:18:00	Billable	Call with S.Packrone re impacted organization and timing of complaint
9/30/2016	Michelle Caiola	0:06:00	Billable	status update from SP
9/30/2016	Michelle Caiola	0:06:00	Billable	update FP re status and staffing
9/30/2016	Seth Packrone	0:06:00	Billable	Update M. Caiola on next steps with impacted organization
9/30/2016	Seth Packrone	0:06:00	Billable	Teleconference with client re: update on grievance process at DOC facility
9/30/2016	Seth Packrone	0:06:00	Billable	Update litigation team re: client grievance status
9/30/2016	Seth Packrone	0:06:00	Billable	Prepare for call with ACLU-NJ
9/30/2016	Seth Packrone	0:54:00	Billable	Teleconference with co-counsel ACLU-NJ re: timing of complaint, legal theory, and class definition
9/30/2016	Seth Packrone	0:12:00	Billable	Strategy session with M. Smith re: contacting impacted organization about bylaws
10/3/2016	Mary-Lee Smith	0:12:00	Billable	Review legal research for proceeding under pseudonym from ACLU
10/3/2016	Mary-Lee Smith	0:18:00	Billable	Review legal research for NJ Ed codes
10/3/2016	Seth Packrone	0:06:00	Billable	Give C. Molholm update on call with client's parent and call with client #2
10/3/2016	Seth Packrone	0:06:00	Billable	Give directions to J. Mukherjee re: requesting phone call at DOC facility with client
10/3/2016	Seth Packrone	0:12:00	Billable	Read and analyze legal research on using pseudonyms in the 3rd circuit
10/3/2016	Seth Packrone	0:12:00	Billable	Teleconference with client re: update on investigation
10/3/2016	Seth Packrone	0:06:00	Billable	Read and analyze NJAC education regulations
10/3/2016	Seth Packrone	0:06:00	Billable	Update M. Smith re: NJAC education regulations
10/4/2016	Seth Packrone	0:06:00	Billable	Follow up on meeting notes with client from 9/16/16
10/4/2016	Seth Packrone	0:18:00	Billable	Read and analyze relevant legal briefing on NJ DOC ad seg policies
10/4/2016	Seth Packrone	0:12:00	Billable	Read and analyze relevant case law
10/4/2016	Seth Packrone	0:06:00	Billable	Read and analyze case law re: ad seg in NJ DOC prisons
10/4/2016	Seth Packrone	0:30:00	Billable	Read and analyze MTD in Contra Case for case law on exhaustion and administrative segregation
10/4/2016	Seth Packrone	0:12:00	Billable	Prepare for call with client's mother re: follow up questions regarding his section of the complaint
10/4/2016	Seth Packrone	0:06:00	Billable	Give directions to C. Molholm re: call with client's mom following up on his education and disability history

10/4/2016	Seth Packrone	0:12:00	Billable	Organize case file re; client's educational documents
10/5/2016	Seth Packrone	0:06:00	Billable	Give C. Molholm instructions re: creating index for client documents
10/5/2016	Seth Packrone	0:06:00	Billable	Teleconference with client's family re: client's educational history
10/5/2016	Seth Packrone	0:24:00	Billable	Teleconference with C. Molholm and client's family re: client's educational history and hospitalizations
10/5/2016	Seth Packrone	0:06:00	Billable	Follow up instructions to C. Molholm re: drafting an update letter to client's family
10/5/2016	Seth Packrone	0:12:00	Billable	Send client records to C. Molholm re: creating index for client
10/5/2016	Seth Packrone	0:12:00	Billable	Teleconference with client from DOC facility re: update on investigation
10/5/2016	Seth Packrone	0:18:00	Billable	Redraft letter to client's mom requesting records
10/5/2016	Seth Packrone	0:06:00	Billable	Send update to M. Smith re: call with client
10/5/2016	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: client call
10/5/2016	Seth Packrone	0:06:00	Billable	Review index for client documents
10/6/2016	Mary-Lee Smith	0:06:00	Billable	Review agenda for call with ACLU
10/6/2016	Seth Packrone	0:06:00	Billable	Correspond with C. Molholm re: client record logs
10/6/2016	Seth Packrone	0:06:00	Billable	Give directions to C. Molholm re: letter to client's parent
10/6/2016	Seth Packrone	0:18:00	Billable	Read and analyze and take notes on memo on claims against DOE from Proskauer
10/6/2016	Seth Packrone	0:06:00	Billable	Draft agenda for ACLU meeting
10/6/2016	Seth Packrone	0:06:00	Billable	Teleconference with impacted organization rep re: update on investigation
10/6/2016	Seth Packrone	0:06:00	Billable	Update M. Smith re: agenda for ACLU, Proskauer memo, and impacted organization call
10/6/2016	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: visit with new client
10/6/2016	Seth Packrone	0:06:00	Billable	Send agenda to ACLU
10/7/2016	Seth Packrone	0:06:00	Billable	Teleconference with R. Livengood re: plan for next co-counsel meeting
10/7/2016	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood and M. Smith re: plan for next co-counsel meeting
10/7/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: follow up after meeting with co-counsel
10/7/2016	Seth Packrone	0:30:00	Billable	Teleconference with R. Livengood and J. LoCicero re: next steps for complaint and visiting clients
10/7/2016	Seth Packrone	0:12:00	Billable	Research client's custody status and potential for Wednesday visit
10/7/2016	Seth Packrone	0:24:00	Billable	Type up notes for M. Smith re: meeting with ACLU and check in about next steps for investigation
10/11/2016	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: visiting new client in ad seg
10/12/2016	Seth Packrone	0:06:00	Billable	Follow up with impacted organization re: update on potential participation
10/12/2016	Seth Packrone	0:06:00	Billable	Teleconference with client re: update on credit status
10/12/2016	Seth Packrone	0:06:00	Billable	Update client notes on call with client
10/12/2016	Seth Packrone	0:06:00	Billable	Update M. Caiola re: next steps in investigation
10/13/2016	Seth Packrone	0:06:00	Billable	Teleconference with impacted organization re: update on potential participation in case
10/14/2016	Michelle Caiola	0:18:00	Billable	Update with SP and strategy on potential organizational plaintiffs
10/14/2016	Michelle Caiola	0:12:00	Billable	review status of potential organizational plaintiffs
10/14/2016	Michelle Caiola	0:12:00	Billable	Check in with S Packrone re: follow-up w/ co-counsel
10/14/2016	Seth Packrone	0:06:00	Billable	Follow up with impacted organization re: data for potential new intakes
10/14/2016	Seth Packrone	0:06:00	Billable	Update litigation team re: status of impacted organization
10/14/2016	Seth Packrone	0:06:00	Billable	Draft agenda for weekly co-counsel call with ACLU
10/14/2016	Seth Packrone	0:18:00	Billable	Update M. Smith re: call with impacted organization and upcoming call with ACLU

10/14/2016	Seth Packrone	0:18:00	Billable	Strategy session with M. Caiola re: next steps in investigation
10/14/2016	Seth Packrone	0:06:00	Billable	Send agenda and update to R. Livengood and J. LoCicero re: co-counsel call
10/14/2016	Seth Packrone	0:42:00	Billable	Teleconference with J. LoCicero and R. Livengood re: update on visit with new client, update on impacted organization, and other relevant organizations
10/14/2016	Seth Packrone	0:06:00	Billable	Check in with M. Caiola re: next steps for litigation
10/14/2016	Seth Packrone	0:06:00	Billable	Update Proskauer Rose re: impacted organization's status in litigation
10/14/2016	Seth Packrone	0:12:00	Billable	Strategy session with M. Caiola re: reaching out to other impacted organizations
10/14/2016	Seth Packrone	0:06:00	Billable	Correspond with ACLU re: reaching out to impacted organizations
10/14/2016	Seth Packrone	0:06:00	Billable	Correspond with Proskauer re: organizational plaintiff status
10/14/2016	Seth Packrone	0:06:00	Billable	Update M. Smith on status of potential organizational plaintiff
10/17/2016	Seth Packrone	0:06:00	Billable	Edit contact to impacted organization
10/17/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: update on investigation and contact with impacted organization
10/17/2016	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: contact with impacted organization
10/17/2016	Seth Packrone	0:12:00	Billable	Teleconference with client re: response from DOC
10/17/2016	Seth Packrone	0:06:00	Billable	Review client communication from DOC
10/17/2016	Seth Packrone	0:12:00	Billable	Update litigation team re: call with client
10/17/2016	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: status of client
10/18/2016	Mary-Lee Smith	0:24:00	Billable	Work session with S.Packrone re complaint and potential client update
10/18/2016	Michelle Caiola	0:18:00	Billable	update from SP re impacted organization outreach
10/18/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: update from client
10/18/2016	Seth Packrone	0:18:00	Billable	Teleconference with impacted organization re: participation in lawsuit
10/18/2016	Seth Packrone	0:06:00	Billable	Update M. Caiola on call w impacted organization
10/18/2016	Seth Packrone	0:12:00	Billable	Update litigation team re: call w impacted organization
10/18/2016	Seth Packrone	0:12:00	Billable	Research other impacted organizations
10/18/2016	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: impacted organization contact
10/18/2016	Seth Packrone	0:12:00	Billable	Prepare for teleconference with M. Smith re: reviewing notes from meeting with ACLU and complaint progress
10/18/2016	Seth Packrone	0:18:00	Billable	Teleconference with M. Smith re: next steps for complaint and outreach to other impacted organizations
10/19/2016	Seth Packrone	0:12:00	Billable	Review impacted organization's website and impacted programs
10/19/2016	Seth Packrone	0:12:00	Billable	Draft email to director of impacted organization re: work on special ed. in prisons
10/19/2016	Seth Packrone	0:06:00	Billable	Send email to director of impacted organization re: their work on special education for incarcerated youth
10/20/2016	Seth Packrone	0:12:00	Billable	Review client documents to determine what other documents we need
10/20/2016	Seth Packrone	0:12:00	Billable	Teleconference with client re: update on education situation
10/21/2016	Seth Packrone	0:06:00	Billable	Finalize notes from call with impacted organization re: status of board approval
10/21/2016	Seth Packrone	0:06:00	Billable	Prepare for call with client's mother re: sending school and medical records
10/21/2016	Seth Packrone	0:06:00	Billable	Teleconference with client's mother re: documents
10/21/2016	Seth Packrone	0:06:00	Billable	Teleconference with client's grandmother re: records
10/21/2016	Seth Packrone	0:06:00	Billable	Prepare for teleconference with client's grandmother re: documents needed
10/21/2016	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: plan for next two meetings with ACLU-NJ
10/24/2016	Michelle Caiola	0:06:00	Billable	status check in with SP
10/26/2016	Seth Packrone	0:06:00	Billable	Update J. Mukherjee re: schedule for visiting clients over next two weeks

10/27/2016	Seth Packrone	0:12:00	Billable	Draft agenda for co-counsel call with ACLU
10/27/2016	Seth Packrone	0:06:00	Billable	Send agenda to M. Smith re: meeting with ACLU
10/27/2016	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: plan for filing and organizational plaintiff
10/27/2016	Seth Packrone	0:12:00	Billable	Send agenda and update to R. Livengood and J. LoCicero re: co-counsel call
10/27/2016	Seth Packrone	0:06:00	Billable	Teleconference with client's mom re: update on records
10/28/2016	Seth Packrone	0:24:00	Billable	Teleconference with J. LoCicero, R. Livengood, and M. Smith re: update on individual plaintiffs, organizational plaintiffs, and complaint drafting process
10/28/2016	Seth Packrone	0:12:00	Billable	Draft update and send it to pro bono counsel regarding litigation update
10/28/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: status of investigation and update for Proskauer
10/31/2016	Michelle Caiola	0:12:00	Billable	Strategy with SP re Org Plaintiffs law re same
10/31/2016	Seth Packrone	0:18:00	Billable	Send update on complaint and timeline for filing to M. Smith
10/31/2016	Seth Packrone	0:06:00	Billable	Edit complaint based on latest changes from ACLU
10/31/2016	Seth Packrone	0:06:00	Billable	Update M. Caiola re: status of organizational plaintiff in NJ DOC litigation
10/31/2016	Seth Packrone	0:06:00	Billable	Give directions to J. Mukherjee re: setting up visits at prisons
11/1/2016	Seth Packrone	0:06:00	Billable	Give J. Mukherjee directions re: sending visit requests to DOC facilities
11/2/2016	Michelle Caiola	0:18:00	Billable	strategy and planning with SP re completing complaint and filing
11/2/2016	Seth Packrone	0:06:00	Billable	Give M. Caiola update regarding timing for filing complaint and organizational plaintiff
11/2/2016	Seth Packrone	0:06:00	Billable	Update attorneys and seek feedback at attorney meeting re: status of organizational plaintiff and status of investigation
11/2/2016	Seth Packrone	0:06:00	Billable	Draft agenda for co-counsel meeting
11/2/2016	Seth Packrone	0:06:00	Billable	Update M. Smith re: agenda for co-counsel meeting and next steps for investigation
11/3/2016	Seth Packrone	0:06:00	Billable	Finalize agenda and send to ACLU for co-counsel meeting
11/3/2016	Seth Packrone	0:12:00	Billable	Gives directions to J. Mukherjee re: Monday visits with clients
11/3/2016	Seth Packrone	0:06:00	Billable	Prepare for TC with co-counsel
11/3/2016	Seth Packrone	0:30:00	Billable	TC with R. Livengood, M. Smith, and J. LoCicero re: timeline for filing, update on clients, and status of organizational plaintiff
11/3/2016	Seth Packrone	0:06:00	Billable	Follow up TC with M. Smith re: next steps for drafting the complaint and following up with clients
11/3/2016	Seth Packrone	0:12:00	Billable	Update M. Smith on latest letters to potential declarants
11/3/2016	Seth Packrone	0:06:00	Billable	Follow up with R. Livengood re: status of records from NJ DOC
11/3/2016	Seth Packrone	0:12:00	Billable	Prepare for visits with clients on 11.7.16
11/4/2016	Michelle Caiola	0:06:00	Billable	t/c with SP re filing date
11/4/2016	Seth Packrone	0:06:00	Billable	Update M. Caiola re: plan for filing case and upcoming prison visits
11/4/2016	Seth Packrone	0:06:00	Billable	Correspond with J. Mukherjee re: status of client visits on 11.7.16
11/4/2016	Seth Packrone	0:06:00	Billable	Follow up with J. Mukherjee re: hospital release for client
11/4/2016	Seth Packrone	0:06:00	Billable	Send releases to ACLU for clients
11/4/2016	Seth Packrone	0:06:00	Billable	Follow up with R. Livengood and B. Friedman from Proskauer re: update on review of OPRA documents
11/7/2016	Seth Packrone	0:36:00	Billable	Drive to NDOC facility to visit client (75 minutes total, bill half)
11/7/2016	Seth Packrone	0:12:00	Billable	Travel between DOC facilities to visit client (approximately 20 minutes bill for half)
11/7/2016	Seth Packrone	0:18:00	Billable	Wait at DOC facility to visit client
11/7/2016	Seth Packrone	0:18:00	Billable	Revise and edit draft of complaint regarding client's section
11/7/2016	Seth Packrone	1:12:00	Billable	Visit with client and J. Mukherjee re: update on complaint and filing timeline
11/7/2016	Seth Packrone	1:00:00	Billable	Visit with client and J. Mukherjee re: reviewing the complaint with him and filing plan

11/7/2016	Seth Packrone	0:18:00	Billable	Waiting at DOC facility for visit with client
11/7/2016	Seth Packrone	0:36:00	Billable	Travel back from DOC facility from visit with client (total 75 minutes, bill for half)
11/7/2016	Seth Packrone	0:06:00	Billable	Give J. Mukherjee directions re: follow up on visit with client
11/7/2016	Seth Packrone	0:12:00	Billable	Update M. Smith re: client visits and status of complaint
11/8/2016	Michelle Caiola	0:06:00	Billable	check in with SP re: client visits
11/8/2016	Seth Packrone	0:06:00	Billable	Update M. Caiola re: visits with clients on 11/7
11/9/2016	Seth Packrone	0:06:00	Billable	Strategy session with J. Mukherjee re: next steps for complaint after client visits
11/9/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith and ACLU re: client's status and records requests with DOC
11/10/2016	Michelle Caiola	0:12:00	Billable	update re org status and demand letter strategy
11/10/2016	Seth Packrone	0:12:00	Billable	Update C. Molholm re: client visits on 11/7 regarding the complaint
11/10/2016	Seth Packrone	0:06:00	Billable	Update M. Caiola re: status of complaint and visits with clients
11/10/2016	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: update meeting about complaint and next steps
11/10/2016	Seth Packrone	0:18:00	Billable	TC with R. Livengood re: update on organizational plaintiff, drafting and filing schedule for complaint
11/10/2016	Seth Packrone	0:18:00	Billable	Send memo to M. Smith re: next steps in investigation, status of organizational plaintiff, and next steps
11/10/2016	Seth Packrone	0:06:00	Billable	Update M. Caiola re: filing schedule for case
11/10/2016	Seth Packrone	0:12:00	Billable	Draft first draft of section on DOC factual background of complaint
11/10/2016	Seth Packrone	0:06:00	Billable	Enter notes from meeting with client into complaint
11/11/2016	Seth Packrone	0:06:00	Billable	Correspond with B. Friedman re: update on document review
11/11/2016	Seth Packrone	0:18:00	Billable	Update client's section of complaint based on 11.7.16 visit with him
11/11/2016	Seth Packrone	0:12:00	Billable	Update second client's section of complaint based on 11.7.16 visit with him
11/11/2016	Seth Packrone	0:12:00	Billable	Edit complaint to include DOE allegations
11/11/2016	Seth Packrone	0:36:00	Billable	Draft first draft of background section on DOC for first draft of complaint
11/11/2016	Seth Packrone	0:06:00	Billable	TC with B. Friedman from Proskauer re: update on complaint and document review
11/11/2016	Seth Packrone	0:06:00	Billable	Update M. Smith re: status of document review
11/11/2016	Seth Packrone	0:30:00	Billable	Draft inadequate education services section of first draft of complaint
11/11/2016	Seth Packrone	0:24:00	Billable	Draft background section on education services at DOC facilities
11/11/2016	Seth Packrone	0:06:00	Billable	Give J. Mukherjee directions re: following up about records with DOC
11/14/2016	Michelle Caiola	0:12:00	Billable	update and strategy on demand letter to DOE, timing
11/14/2016	Seth Packrone	0:06:00	Billable	Update ACLU re: call with Brian Friedman
11/14/2016	Seth Packrone	0:06:00	Billable	Review draft of demand letter to DOE
11/14/2016	Seth Packrone	0:18:00	Billable	Correspond with M. Smith re: strategy for DOE allegations moving forward
11/14/2016	Seth Packrone	0:12:00	Billable	Review background section on DOC's statistics
11/14/2016	Seth Packrone	1:00:00	Billable	Draft first draft of background section on DOC re: structure of DOC's educational services being provided to students
11/14/2016	Seth Packrone	0:42:00	Billable	Draft first draft of background section on inadequacy of DOC's educational program for first draft of complaint
11/14/2016	Seth Packrone	0:06:00	Billable	Correspond with ACLU re: DOE demand letter
11/14/2016	Seth Packrone	0:18:00	Billable	Memo re: DOE demand letter strategy
11/14/2016	Seth Packrone	0:06:00	Billable	Update M. Caiola re: status of complaint and visits with clients
11/14/2016	Seth Packrone	0:12:00	Billable	Get feedback from M. Caiola re: structure of background section of complaint
11/14/2016	Seth Packrone	0:12:00	Billable	Give J. Mukherjee instructions re: following up about records this week

11/14/2016	Seth Packrone	0:24:00	Billable	Draft ADA section of DOC background section in first draft of complaint
11/15/2016	Seth Packrone	0:24:00	Billable	Read through and edit first draft of complaint
11/15/2016	Seth Packrone	0:36:00	Billable	Edit DOC background section to include ADA meaningful access descriptions
11/15/2016	Seth Packrone	0:06:00	Billable	TC with J. Mukherjee re: update on call with client
11/15/2016	Seth Packrone	0:06:00	Billable	Prepare for TC with client's mom re: status of records
11/15/2016	Seth Packrone	0:06:00	Billable	Teleconference with client's mother re: records
11/16/2016	Seth Packrone	0:54:00	Billable	Read and revise entire first draft of complaint and check citations to records
11/16/2016	Seth Packrone	0:12:00	Billable	Send complete first draft of complaint to M. Smith with comments on the draft
11/17/2016	Mary-Lee Smith	0:42:00	Billable	Review complaint: legal framework section in intro as compared with facts and legal claims
11/17/2016	Seth Packrone	0:12:00	Billable	Draft agenda for co-counsel meeting (and go through complaint to find items needed for follow up)
11/17/2016	Seth Packrone	0:06:00	Billable	Send agenda to M. Smith with comments for tomorrow's call
11/17/2016	Seth Packrone	0:12:00	Billable	Send agenda to ACLU with note for tomorrow's meeting
11/18/2016	Mary-Lee Smith	0:24:00	Billable	Call with ACLU re plaintiffs including orgs and demand letter etc
11/18/2016	Mary-Lee Smith	0:42:00	Billable	Begin revisions to named plaintiff sections of complaint
11/18/2016	Seth Packrone	0:06:00	Billable	TC with J. Mukherjee re: records requests from NJ DOC
11/18/2016	Seth Packrone	0:12:00	Billable	Follow up on client's hospitalization for new records requests
11/18/2016	Seth Packrone	0:06:00	Billable	Prepare for co-counsel TC with ACLU re: next steps for complaint and organizational plaintiff
11/18/2016	Seth Packrone	0:24:00	Billable	TC with ACLU and M. Smith re: next steps for complaint and organizational plaintiff
11/18/2016	Seth Packrone	0:18:00	Billable	Follow up strategy session with M. Smith re: updates on plaintiffs and remaining work for the complaint
11/18/2016	Seth Packrone	0:12:00	Billable	Follow up correspondence with R. Livengood re: complaint drafting timeline and incorporating organizational plaintiff allegations
11/18/2016	Seth Packrone	0:06:00	Billable	Follow up with B. Friedman and litigation re: OPRA document review
11/18/2016	Seth Packrone	0:12:00	Billable	Follow up with J. Mukherjee re: next steps for records requests for clients
11/18/2016	Seth Packrone	0:12:00	Billable	Update M. Caiola on plan for filing case and next steps
11/19/2016	Mary-Lee Smith	0:48:00	Billable	Revise complaint: begin review of DOC factual background section
11/21/2016	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: editing plan for complaint
11/21/2016	Seth Packrone	0:06:00	Billable	TC with R. Livengood re: editing plan for complaint and organizational plaintiff allegations
11/21/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: organizational plaintiff and outstanding complaint tasks
11/22/2016	Mary-Lee Smith	3:06:00	Billable	Review/revise DOC complaint: intro and DOC factual sections.
11/22/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: editing plan for complaint
11/22/2016	Seth Packrone	0:06:00	Billable	Follow up with R. Livengood re: editing plan and outstanding complaint sections
11/22/2016	Seth Packrone	0:06:00	Billable	Give J. Mukherjee directions re: mailings for NJ DOC to get records
11/22/2016	Seth Packrone	0:12:00	Billable	Review letters to send for NJ DOC re: records requests
11/22/2016	Seth Packrone	0:06:00	Billable	TC with M. Smith re: application of case law in NJ DOC complaint to DOE
11/22/2016	Seth Packrone	0:06:00	Billable	TC with R. Livengood re: updated version of complaint and educational budgets of NJ DOC facilities
11/23/2016	Mary-Lee Smith	1:18:00	Billable	Revise complaint: reorganize and revise DOC factual allegations
11/23/2016	Seth Packrone	0:06:00	Billable	Review R. Livengood's notes re: organizational standing
11/23/2016	Seth Packrone	0:12:00	Billable	Correspond with R. Livengood re: next steps for organizational plaintiff
11/23/2016	Seth Packrone	0:06:00	Billable	Draft short memo re: org standing for ACLU
11/23/2016	Seth Packrone	0:06:00	Billable	Follow up with R. Livengood re: contacting Plaintiffs' parents

11/23/2016	Seth Packrone	0:06:00	Billable	Review new client docs sent by parent
11/23/2016	Seth Packrone	0:06:00	Billable	Give J. Mukherjee instructions re: organizing case file with new records
11/23/2016	Seth Packrone	0:18:00	Billable	Review Proskauer's notes on OPRA documents
11/27/2016	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: legal claims against DOE and sections re: same
11/27/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: new draft of complaint and timing for sending to ACLU
11/28/2016	Seth Packrone	0:12:00	Billable	TC with Plaintiff re: update on his educational documents
11/28/2016	Seth Packrone	0:24:00	Billable	Incorporate ACLU-NJ's sections on DOE and org plaintiff
11/29/2016	Michelle Caiola	0:06:00	Billable	status on filing with SP
11/29/2016	Seth Packrone	0:42:00	Billable	Revise first draft of introduction laying out legal framework in complaint and draft short summary sections for 2 plaintiffs
11/29/2016	Seth Packrone	0:12:00	Billable	Update M. Smith re: progress on complaint and outstanding issues to discuss regarding the complaint
11/29/2016	Seth Packrone	0:18:00	Billable	Revise and edit section of complaint on Parties
11/29/2016	Seth Packrone	0:06:00	Billable	Add descriptions of defendants to first draft of complaint
11/29/2016	Seth Packrone	0:06:00	Billable	Edit and revise class allegations section of complaint
11/29/2016	Seth Packrone	0:30:00	Billable	Edit and revise first draft of DOC section of complaint based on M. Smith's comments and edits
11/29/2016	Seth Packrone	0:06:00	Billable	Edit and revise ACLU's first draft of DOE oversight section of complaint
11/30/2016	Mary-Lee Smith	0:36:00	Billable	Work session with Seth re finalizing the complaint, working with ACLU, visiting clients, etc
11/30/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: follow up about next steps for complaint
11/30/2016	Seth Packrone	0:06:00	Billable	Prepare for meeting with M. Smith re: creating task list for NJ DOC
11/30/2016	Seth Packrone	0:06:00	Billable	Give directions to C. Molholm re: upcoming visits with clients
11/30/2016	Seth Packrone	0:12:00	Billable	Edit plaintiff section of complaint based on most recent visit
11/30/2016	Seth Packrone	0:18:00	Billable	Edit plaintiff 2 section of complaint to make consistent with the rest of the complaint
11/30/2016	Seth Packrone	0:24:00	Billable	TC with M. Smith re: get directions for structural edits to complaint and remaining filing tasks
11/30/2016	Seth Packrone	0:06:00	Billable	Research NJDOC jurisdiction over facilities
11/30/2016	Seth Packrone	0:18:00	Billable	Revise complaint based on new sections from ACLU
11/30/2016	Seth Packrone	0:12:00	Billable	Give directions to J. Mukherjee re: next tasks for revising complaint
11/30/2016	Seth Packrone	0:24:00	Billable	Redraft plaintiff 3 section based on most recent client interview
11/30/2016	Seth Packrone	0:12:00	Billable	Get update from J. Mukherjee re: PHV motions in DNJ
11/30/2016	Seth Packrone	0:24:00	Billable	Edit IDEA section based on responsibility of each defendant
11/30/2016	Seth Packrone	0:12:00	Billable	Edit ADA section based on each defendant's responsibility for each allegation
11/30/2016	Seth Packrone	0:12:00	Billable	Edit Section 504 section of complaint based on responsibility for each defendant
11/30/2016	Seth Packrone	0:12:00	Billable	Edit State law sections of complaint
11/30/2016	Seth Packrone	0:24:00	Billable	Revise and edit complete second draft of complaint
11/30/2016	Seth Packrone	0:12:00	Billable	Draft update on complaint and next steps for filing to send to ACLU
11/30/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: next steps for complaint and filing task list
12/1/2016	Mary-Lee Smith	1:00:00	Billable	Revise NJDOC Complaint: intro and parties section
12/1/2016	Mary-Lee Smith	2:18:00	Billable	Revise NJDOC Complaint: class allegations, DOC/DOE sections and individuals plaintiffs claims
12/1/2016	Mary-Lee Smith	1:48:00	Billable	Revise NJDOC Complaint: legal claims section
12/1/2016	Mary-Lee Smith	0:54:00	Billable	Revise NJDOC complaint: legal research into NJDOC as ESA and into NJLAD public accommodation definition
12/1/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: update for ACLU regarding remaining tasks for filing

12/1/2016	Seth Packrone	0:06:00	Billable	Send update to ACLU re: Friday's meeting and next steps for complaint
12/1/2016	Seth Packrone	0:30:00	Billable	Revise and edit complete draft of complaint pp. 12-23
12/1/2016	Seth Packrone	0:12:00	Billable	Add legal arguments to plaintiff's section of complaint
12/1/2016	Seth Packrone	0:18:00	Billable	Revise and edit complete draft of complaint pp. 30-41
12/1/2016	Seth Packrone	0:36:00	Billable	Revise and edit second draft of plaintiff sections of complaint
12/1/2016	Seth Packrone	0:18:00	Billable	Send complete second draft of complaint to M. Smith with memo on remaining work
12/1/2016	Seth Packrone	0:06:00	Billable	Review J. LoCicero's response to next steps and task list
12/1/2016	Seth Packrone	0:12:00	Billable	Update M. Smith re: ACLU's plans for editing the complaint moving forward
12/2/2016	Michelle Caiola	0:06:00	Billable	check in with SP re: plan for filing
12/2/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: next steps for editing complaint
12/2/2016	Seth Packrone	0:12:00	Billable	Review and analyze M. Smith's comments on complaint second draft
12/2/2016	Seth Packrone	0:06:00	Billable	Update M. Caiola re: plan for filing case
12/2/2016	Seth Packrone	0:06:00	Billable	Give directions to J. Mukherjee re: PHV applications and upcoming client visits
12/2/2016	Seth Packrone	0:12:00	Billable	Correspond with J. LoCicero re: details for filing case and PHV applications
12/2/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: organizational plaintiff standing
12/2/2016	Seth Packrone	0:06:00	Billable	Review visitation requests before J. Mukherjee submits them
12/2/2016	Seth Packrone	0:12:00	Billable	Update Proskauer team re: complaint filing timeline and remaining tasks
12/2/2016	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: timeline for review of complaint
12/4/2016	Seth Packrone	0:18:00	Billable	Review and take notes on client's ed docs from facilities
12/4/2016	Seth Packrone	0:12:00	Billable	Review the rest of clients's educational documents from client's mom
12/4/2016	Seth Packrone	0:12:00	Billable	Update NJDOC complaint based on client's documents from parent
12/4/2016	Seth Packrone	0:18:00	Billable	Review Proskauer's findings on OPRA responses
12/4/2016	Seth Packrone	0:12:00	Billable	Revise second draft of paragraphs 24-59 of NJ DOC complaint
12/4/2016	Seth Packrone	0:18:00	Billable	Revise second draft of paragraphs 1-23 of NJ DOC complaint
12/4/2016	Seth Packrone	0:18:00	Billable	Revise second draft of paragraphs 59-106 of NJ DOC complaint
12/4/2016	Seth Packrone	0:24:00	Billable	Revise second draft of paragraphs 106-167 of NJ DOC complaint
12/4/2016	Seth Packrone	0:24:00	Billable	Revise second draft of paragraphs 167-251 of NJ DOC complaint
12/5/2016	Mary-Lee Smith	1:06:00	Billable	Revise DOC Complaint: review revisions and comments from S.Packrone; finalize for ACLU review
12/5/2016	Seth Packrone	0:30:00	Billable	Revise second draft of complaint 252-284
12/5/2016	Seth Packrone	0:18:00	Billable	Revise second draft of state law section of complaint
12/5/2016	Seth Packrone	0:24:00	Billable	Draft first draft of prayer for relief section of complaint
12/5/2016	Seth Packrone	0:12:00	Billable	Update M. Caiola re: plan for filing case next week
12/5/2016	Seth Packrone	0:06:00	Billable	Review and edit second draft of complaint
12/5/2016	Seth Packrone	0:30:00	Billable	Update and edit client section based on records from client's parent
12/5/2016	Seth Packrone	0:24:00	Billable	Review Proskauer materials on OPRA requests for relevant information to include in complaint
12/5/2016	Seth Packrone	0:24:00	Billable	Incorporate Proskauer's findings into second draft of complaint
12/5/2016	Seth Packrone	0:12:00	Billable	Research IPPs under NJ state law
12/5/2016	Seth Packrone	0:18:00	Billable	Research TABE in NJDOC OPRA responses and incorporate into complaint
12/5/2016	Seth Packrone	0:24:00	Billable	Incorporate IPP and TABE research into complaint

12/5/2016	Seth Packrone	0:12:00	Billable	Edit section of complaint on classification system for classifying NJDOC residents
12/5/2016	Seth Packrone	0:12:00	Billable	Review Wagner and Bayside State Prison handbook sections on ICC classification criteria
12/5/2016	Seth Packrone	0:12:00	Billable	Research Title I requirements for state facilities
12/5/2016	Seth Packrone	0:18:00	Billable	Send second draft of complaint to M. Smith with memo on comments and significant edits
12/5/2016	Seth Packrone	0:30:00	Billable	Input M. Smith's edits into 12.5 draft of NJDOC complaint
12/5/2016	Seth Packrone	0:30:00	Billable	Revise and edit NJDOC complaint to send to ACLU for their review
12/5/2016	Seth Packrone	0:06:00	Billable	Send complete draft of complaint to ACLU for their review and edits
12/5/2016	Seth Packrone	0:06:00	Billable	Review comments for ACLU in complete draft of complaint
12/5/2016	Seth Packrone	0:12:00	Billable	Draft memo to ACLU re: edits to complete draft of complaint and notes for their review
12/5/2016	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: remaining edits to Dec. 5th draft of complaint
12/6/2016	Seth Packrone	0:30:00	Billable	Draft filing task list memo with comments for M. Smith
12/6/2016	Seth Packrone	0:12:00	Billable	Revise task list and comments for M. Smith
12/6/2016	Seth Packrone	0:06:00	Billable	Review legal argument to pursue pseudonymously
12/6/2016	Seth Packrone	0:12:00	Billable	Send task list memo with comments to M. Smith for her review and input
12/6/2016	Seth Packrone	0:06:00	Billable	Outline letters to attach with courtesy copies of complaint to defendants
12/6/2016	Seth Packrone	0:18:00	Billable	Compile case law that provide basis for NJDOC allegations into memo
12/7/2016	Seth Packrone	0:12:00	Billable	Give C. Molholm directions re: fact-checking and editing complaint
12/7/2016	Seth Packrone	0:12:00	Billable	Read and analyze CG v. PA DOE
12/7/2016	Seth Packrone	0:12:00	Billable	Read and analyze relevant case law
12/7/2016	Seth Packrone	0:06:00	Billable	Give J. Mukherjee directions re: following up with DOC facility and next steps for filing
12/7/2016	Seth Packrone	0:06:00	Billable	Update attorneys at attorney meeting re: plans for filing
12/7/2016	Seth Packrone	0:06:00	Billable	Correspond with K. Hamilton and C. Conroy re: upcoming press needs and strategy for filing complaint
12/7/2016	Seth Packrone	0:18:00	Billable	Review, analyze and take notes on relevant case law re: DOC
12/7/2016	Seth Packrone	0:12:00	Billable	Review, analyze, and take notes on relevant case law re: DOC
12/7/2016	Seth Packrone	0:12:00	Billable	Review, analyze, and take notes on Buckley
12/7/2016	Seth Packrone	0:36:00	Billable	Draft first half of press release for filing complaint
12/7/2016	Seth Packrone	0:12:00	Billable	Send short memo to M. Smith re: next steps for filing case
12/8/2016	Mary-Lee Smith	0:36:00	Billable	Receive and review DOC complaint from ACLU
12/8/2016	Mary-Lee Smith	0:18:00	Billable	Call with S. Packrone re ACLU revisions to complaint and next steps
12/8/2016	Mary-Lee Smith	0:24:00	Billable	Review DOC complaint draft to identify areas to discuss with ACLU
12/8/2016	Seth Packrone	0:30:00	Billable	Complete first draft of press release for complaint filing
12/8/2016	Seth Packrone	0:06:00	Billable	Revise and edit first draft of press release for complaint filing
12/8/2016	Seth Packrone	0:30:00	Billable	Complete drafts of letters to Defendants to attach to copies of complaint upon filing
12/8/2016	Seth Packrone	0:18:00	Billable	Review and analyze ACLU edits to complaint
12/8/2016	Seth Packrone	0:06:00	Billable	TC with R. Livengood re: prepare complaint draft to send to Defendants
12/8/2016	Seth Packrone	0:24:00	Billable	TC with M. Smith re: next steps for complaint and substantive allegations in complaint
12/8/2016	Seth Packrone	0:18:00	Billable	Send response to ACLU's edits and update on next steps
12/8/2016	Seth Packrone	0:30:00	Billable	TC with R. Livengood re: ACLU's substantive edits to complaint
12/8/2016	Seth Packrone	0:06:00	Billable	Draft agenda for co-counsel call

12/8/2016	Seth Packrone	0:06:00	Billable	Update m. Smith re: new materials drafted and agenda for call
12/9/2016	Mary-Lee Smith	1:06:00	Billable	Work session with ACLU re complaint, timelines and media
12/9/2016	Michelle Caiola	0:06:00	Billable	confer with SP re timing of complaint filing
12/9/2016	Seth Packrone	0:12:00	Billable	Update M. Smith re: plan for filing and suggestions for co-counsel's edits
12/9/2016	Seth Packrone	0:12:00	Billable	Review and revise co-counsel's edits to complaint in preparation for co-counsel meeting
12/9/2016	Seth Packrone	0:06:00	Billable	Correspond with J. LoCicero re: agenda items for today's call
12/9/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: edits to complaint
12/9/2016	Seth Packrone	0:06:00	Billable	Prepare for Monday's visits with clients
12/9/2016	Seth Packrone	0:06:00	Billable	Review complaint and co-counsel's edits to complaint
12/9/2016	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: edits to complaint
12/9/2016	Seth Packrone	1:00:00	Billable	TC with M. Smith, R. Livengood, and J. LoCicero re: plan for filing complaint, media, and legal claims in complaint
12/9/2016	Seth Packrone	0:06:00	Billable	Follow up with co-counsel re: call to go through complaint with edits
12/9/2016	Seth Packrone	0:06:00	Billable	Check in with M. Smith re: next steps for case
12/11/2016	Mary-Lee Smith	0:48:00	Billable	Revise press release
12/11/2016	Seth Packrone	0:36:00	Billable	Revise press release and send to press team
12/12/2016	Mary-Lee Smith	0:24:00	Billable	Revise/finalize press release per S.Packrone and C.Conroy edits
12/12/2016	Seth Packrone	0:18:00	Billable	Review national disability consultant's comments on complaint
12/12/2016	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: national disability consultant's comments on complaint and plan for filing
12/12/2016	Seth Packrone	0:06:00	Billable	Follow up with DRA press team re: next draft of press release
12/12/2016	Seth Packrone	0:06:00	Billable	TC with co-counsel re: plan for filing
12/12/2016	Seth Packrone	0:06:00	Billable	Correspond with co-counsel re: national disability consultant's edits to complaint
12/12/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: edits to complaint and next steps
12/12/2016	Seth Packrone	0:06:00	Billable	Correspond with B. Silverman re: next steps for complaint
12/12/2016	Seth Packrone	1:36:00	Billable	Travel to and from DOC facilities for client visits (3.2 total - bill half)
12/12/2016	Seth Packrone	0:12:00	Billable	Prepare for interview with client re: remaining complaint edits
12/12/2016	Seth Packrone	0:12:00	Billable	Wait at DOC facility for visit with client re: confirm facts in complaint
12/12/2016	Seth Packrone	1:12:00	Billable	Visit with client at DOC facility re: confirm facts in complaint
12/12/2016	Seth Packrone	0:30:00	Billable	Wait at DOC facility for visit with client
12/12/2016	Seth Packrone	1:00:00	Billable	Meet with client re: going over complaint and plan for filing
12/12/2016	Seth Packrone	0:06:00	Billable	Correspond with C. Conroy re: second draft of press release for NJDOC filing
12/12/2016	Seth Packrone	0:30:00	Billable	Edit press release based on co-counsel's comments and edits
12/12/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: finalizing press release to send to co-counsel
12/13/2016	Mary-Lee Smith	0:18:00	Billable	Draft filing plan with schedule for team to review/comment
12/13/2016	Mary-Lee Smith	0:12:00	Billable	Teleconference with co-counsel re timing of filing
12/13/2016	Mary-Lee Smith	0:12:00	Billable	Email to team re proposed plan and timeline for completing complaint and filing
12/13/2016	Seth Packrone	0:06:00	Billable	Finalize press release to send to co-counsel
12/13/2016	Seth Packrone	0:06:00	Billable	Correspond with co-counsel re: press release for their edits
12/13/2016	Seth Packrone	0:12:00	Billable	TC with M. Smith re: timeline for filing complaint
12/13/2016	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: timeline for filing complaint

12/14/2016	Mary-Lee Smith	0:18:00	Billable	Call/email exchange with S.Packrone re organization of complaint and co-counsel input
12/14/2016	Mary-Lee Smith	0:12:00	Billable	Call with co-counsel and team re edits to complaint
12/14/2016	Mary-Lee Smith	0:18:00	Billable	Call with co-counsel and DRA re edits to complaint and next steps
12/14/2016	Mary-Lee Smith	0:12:00	Billable	Call with co-counsel and team re call with Proskauer
12/14/2016	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: next steps in reviewing co-counsel's comments on complaint
12/14/2016	Seth Packrone	0:06:00	Billable	Correspond with B. Silverman re: discussing deadlines for filing
12/14/2016	Seth Packrone	0:06:00	Billable	Update M. Caiola re: plan for filing
12/14/2016	Seth Packrone	0:12:00	Billable	TC with B. Silverman re: Proskauer's comments on draft
12/14/2016	Seth Packrone	0:06:00	Billable	Review and analyze client grievance materials he requested from NJDOC
12/14/2016	Seth Packrone	0:12:00	Billable	TC with R. Livengood, J. LoCicero, and M. Smith re: mplementing edits
12/14/2016	Seth Packrone	0:12:00	Billable	TC with M. Smith re: process for implementing remaining edits and comments into complaint
12/14/2016	Seth Packrone	0:06:00	Billable	Review standards for meaningful and equal access under the ADA
12/14/2016	Seth Packrone	0:30:00	Billable	TC with co-counsel re: next steps for complaint draft
12/14/2016	Seth Packrone	0:18:00	Billable	TC with co-counsel re: next steps for complaint drafting
12/14/2016	Seth Packrone	0:06:00	Billable	Follow up TC with M. Smith re: editing complaint
12/14/2016	Seth Packrone	0:12:00	Billable	Send standing memo and client grievance materials to R. Livengood
12/15/2016	Mary-Lee Smith	2:54:00	Billable	Work session w/ Seth Packrone assessing revisions/additions to complaint and making further edits
12/15/2016	Mary-Lee Smith	0:12:00	Billable	Legal research re exhaustion
12/15/2016	Mary-Lee Smith	1:42:00	Billable	Work session with S.Packrone to incorporate edits from national disability consultant and discuss further follow up with co-counsel
12/15/2016	Mary-Lee Smith	0:36:00	Billable	Review revised complaint with all comments/redline for co-counsel; add to comment bubbles
12/15/2016	Seth Packrone	0:18:00	Billable	Update filing checklist based on call with co-counsel on 12.14
12/15/2016	Seth Packrone	0:12:00	Billable	Draft letter to client to update him on plan for filing
12/15/2016	Seth Packrone	0:12:00	Billable	Draft letter to client to update him on plan for filing
12/15/2016	Seth Packrone	0:12:00	Billable	Review notes from client visits and prep for complaint drafting session
12/15/2016	Seth Packrone	0:12:00	Billable	Review and edit NJCRA section of complaint
12/15/2016	Seth Packrone	0:12:00	Billable	Prepare documents for M. Smith's review and analysis
12/15/2016	Seth Packrone	0:12:00	Billable	Draft agenda for meeting with M. Smith and update her on status of various filing documents
12/15/2016	Seth Packrone	2:54:00	Billable	Work session with M. Smith re: review and incorporate co-counsel's edits to the complaint
12/15/2016	Seth Packrone	1:42:00	Billable	Work session with M. Smith re: review and incorporate national disability consultant's substantive edits and comments into complaint
12/15/2016	Seth Packrone	0:24:00	Billable	Edit complaint based on M. Smith's instructions
12/15/2016	Seth Packrone	0:06:00	Billable	Edit task list and send to co-counsel for work division for filing
12/15/2016	Seth Packrone	0:54:00	Billable	Insert national disability consultant's edits and comments into complaint based on M. Smith's instructions
12/15/2016	Seth Packrone	0:12:00	Billable	Review regulations for SEAs under IDEA
12/15/2016	Seth Packrone	0:12:00	Billable	Draft memo for co-counsel re: outstanding edits and next steps for complaint
12/15/2016	Seth Packrone	0:18:00	Billable	Review Section 504 regulations and case law
12/15/2016	Seth Packrone	0:12:00	Billable	Draft memo for M. Smith re: Section 504 regs on reasonable modifications
12/16/2016	Mary-Lee Smith	0:48:00	Billable	Legal research into equal access v. meaningful access
12/16/2016	Mary-Lee Smith	0:12:00	Billable	Review legal research from S.Packrone re SEA
12/16/2016	Seth Packrone	0:18:00	Billable	Review and edit substantive comments about remaining edits to send to co-counsel

12/16/2016	Seth Packrone	0:36:00	Billable	Read and analyze regulations regarding SEA's monitoring duties under IDEA
12/16/2016	Seth Packrone	0:30:00	Billable	Draft memo regarding IDEA regulations about SEA's monitoring and enforcement duties
12/16/2016	Seth Packrone	0:06:00	Billable	Send memo on SEAs under IDEA to M. Smith with notes for next steps for complaint
12/16/2016	Seth Packrone	0:06:00	Billable	Send new complaint to co-counsel with update regarding our edits and comments
12/16/2016	Seth Packrone	0:12:00	Billable	Give directions to J. Mukherjee re: sending client letters and documents
12/16/2016	Seth Packrone	0:12:00	Billable	Finalize letters to clients and send to J. Mukherjee with notes for further proofreading
12/16/2016	Seth Packrone	0:06:00	Billable	TC with client's mother re: documents
12/16/2016	Seth Packrone	0:12:00	Billable	TC with R. Livengood re: IDEA regulations and role of SEA in NJ
12/16/2016	Seth Packrone	0:06:00	Billable	Update M Smith re: next steps for research on IDEA regulations
12/16/2016	Seth Packrone	0:12:00	Billable	TC with client's mother
12/16/2016	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: IDEA regs and editing complaint
12/17/2016	Seth Packrone	0:24:00	Billable	Draft short memo re: NJDOE's role as SEA for NJDOC
12/17/2016	Seth Packrone	0:06:00	Billable	Correspond with co-counsel re: changes to complaint based on NJDOE's role as SEA
12/19/2016	Mary-Lee Smith	0:24:00	Billable	Call with national disability consultant and co-counsel re advice for terminology in brief
12/19/2016	Mary-Lee Smith	0:48:00	Billable	Call with co-counsel re revisions and questions to the brief
12/19/2016	Mary-Lee Smith	3:24:00	Billable	Work on NJDOC complaint: review co-counsel edits and accept/comment as needed; rework ADA sections per conversation with national disability consultant.
12/20/2016	Mary-Lee Smith	0:18:00	Billable	Call with co-counsel to finalize last question/issues before sending to Proskauer
1/3/2017	Mary-Lee Smith	0:06:00	Billable	Email to S.Packrone re status of review of press release and set up meeting
1/3/2017	Mary-Lee Smith	0:48:00	Billable	Check in with S.Packrone re Complaint, co-counsel edits/strategy and press release/strategy
1/3/2017	Mary-Lee Smith	0:36:00	Billable	Review/revise press release w/ co-counsel edits
1/3/2017	Mary-Lee Smith	0:48:00	Billable	Review/revise motion to proceed using fictitious names
1/3/2017	Mary-Lee Smith	1:00:00	Billable	Receive and review co-counsel edits to complaint; email to S.Packrone and email to team re same
1/3/2017	Seth Packrone	0:12:00	Billable	Correspond with litigation team re: next steps for complaint and press release
1/3/2017	Seth Packrone	0:12:00	Billable	Review new NJDOE allegations in complaint
1/3/2017	Seth Packrone	0:12:00	Billable	Review new draft of complaint after edits from national disability consultant
1/3/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: update on NJDOC matter and next steps for filing
1/3/2017	Seth Packrone	0:06:00	Billable	Prepare for update call with M. Smith re: next steps for NJDOC filing
1/3/2017	Seth Packrone	0:42:00	Billable	TC with M. Smith re: next steps in editing process for NJDOC complaint
1/3/2017	Seth Packrone	0:06:00	Billable	Update task list for filing based on next steps
1/3/2017	Seth Packrone	0:12:00	Billable	Send update to co-counsel for next steps for NJDOC filing
1/3/2017	Seth Packrone	0:12:00	Billable	Update media team regarding media strategy for filing
1/3/2017	Seth Packrone	0:06:00	Billable	Correspond with J. LoCicero re: organizational plaintiff's membership and next co-counsel meeting
1/3/2017	Seth Packrone	0:24:00	Billable	Edit pp. 1-10 of 12.30 draft of complaint
1/3/2017	Seth Packrone	0:30:00	Billable	Review and edit first draft of brief to proceed under pseudonym
1/3/2017	Seth Packrone	0:12:00	Billable	Read and analyze M. Smith's edits and comments to brief to proceed under pseudonym
1/4/2017	Mary-Lee Smith	0:18:00	Billable	Work session with S.Packrone re next steps for finalizing complaint and motion to proceed under pseudonym
1/4/2017	Mary-Lee Smith	0:18:00	Billable	Call with co-counsel and S.Packrone re next steps for finalizing the complaint and mot to proceed under pseudonym.
1/4/2017	Mary-Lee Smith	0:12:00	Billable	Call w/ S.Packrone re co-counsel's edits to complaint
1/4/2017	Mary-Lee Smith	0:42:00	Billable	Work session with S.Packrone re final edits to complaint

1/4/2017	Mary-Lee Smith	0:24:00	Billable	Revise/revise motion to proceed under pseudonym; send to ACLU
1/4/2017	Mary-Lee Smith	0:36:00	Billable	Receive S.Packrone edits pages 1-30 of complaint; review and further revise as needed
1/4/2017	Mary-Lee Smith	2:06:00	Billable	Review co-counsel comments on complaint; respond to each by revision and/or further research
1/4/2017	Mary-Lee Smith	0:06:00	Billable	Draft email to S.Packrone outlining next steps in complaint revisions
1/4/2017	Mary-Lee Smith	0:18:00	Billable	Draft talking points for call with co-counsel re complaint
1/4/2017	Michelle Caiola	0:30:00	Billable	update/consult with SP re filing plans
1/4/2017	Seth Packrone	0:12:00	Billable	Correspond with litigation team re: plan for incorporating co-counsel's comments/edits to complaint
1/4/2017	Seth Packrone	0:18:00	Billable	Review and analyze co-counsel's edits/comments to complaint
1/4/2017	Seth Packrone	0:06:00	Billable	Review and analyze case law on retaliation for proceeding under pseudonym
1/4/2017	Seth Packrone	0:36:00	Billable	Read and analyze Provident Life and other case law regarding proceeding under pseudonym and editing pseudonym draft
1/4/2017	Seth Packrone	0:12:00	Billable	Read and analyze Provident Life to incorporate more analysis under third factor for proceeding under pseudonym
1/4/2017	Seth Packrone	0:30:00	Billable	TC with M. Smith re: plan for incorporating edits/comments from co-counsel draft into complaint
1/4/2017	Seth Packrone	0:24:00	Billable	TC with litigation team (M. Smith, J. LoCicero, and R. Livengood) re: next steps for NJDOC complaint
1/4/2017	Seth Packrone	0:06:00	Billable	Follow up TC with M. Smith re: reviewing edits to complaint
1/4/2017	Seth Packrone	0:06:00	Billable	Update M. Caiola on plans for filing the NJDOC complaint
1/4/2017	Seth Packrone	0:30:00	Billable	Redraft portions of motion to proceed under pseudonym based on case law research
1/4/2017	Seth Packrone	0:06:00	Billable	Send new draft of pseudonym brief to M. Smith with notes and comments for further editing
1/4/2017	Seth Packrone	0:24:00	Billable	Review and edit pp. 11-20 of NJDOC complaint
1/4/2017	Seth Packrone	0:12:00	Billable	Review and edit pp. 20-29 of NJDOC complaint
1/4/2017	Seth Packrone	0:42:00	Billable	TC with M. Smith to go through edits and comments to NJDOC complaint and prepare for final revisions
1/4/2017	Seth Packrone	0:54:00	Billable	Input edits and comments into version of complaint with co-counsel's comments/edits
1/4/2017	Seth Packrone	0:06:00	Billable	Send complaint to M. Smith with edits and comments and notes for next steps
1/5/2017	Mary-Lee Smith	0:12:00	Billable	Dicuss complaint global changes with S.Packrone
1/5/2017	Mary-Lee Smith	0:06:00	Billable	Email exchange with S.Packrone re further global changes to complaint
1/5/2017	Mary-Lee Smith	2:42:00	Billable	Revise DOC complaint per S.Packrone comments/questions; finalize to send to ACLU
1/5/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: remaining edits to complaint
1/5/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: agenda for co-counsel call
1/5/2017	Seth Packrone	0:54:00	Billable	Close review and edits to pp. 30-44 of complaint
1/5/2017	Seth Packrone	0:48:00	Billable	Close review and edits to pp. 44-57 of NJDOC complaint
1/5/2017	Seth Packrone	0:30:00	Billable	TC with J. LoCicero, R. Livengood, and M. Smith re: next steps for incorporating co-counsel's edits and comments into complaint
1/5/2017	Seth Packrone	0:18:00	Billable	Follow up TC with M. Smith re: timeline for final edits to complaint, update on TC with client, and national disability consultant's research on the impact of solitary confinements on youths with disabilities
1/5/2017	Seth Packrone	0:06:00	Billable	TC with client re: update about his status at DOC facility
1/5/2017	Seth Packrone	0:06:00	Billable	Get update from M. Smith re: next steps for coordinating with co-counsel
1/5/2017	Seth Packrone	0:24:00	Billable	Continue to edit and address global changes to complaint
1/5/2017	Seth Packrone	1:24:00	Billable	Edit and review complete draft of complaint based on M. Smith and co-counsel's comments
1/5/2017	Seth Packrone	0:06:00	Billable	Send new draft of complaint to M. Smith with notes and comments for further review
1/5/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: updates on global changes to complaint
1/6/2017	Mary-Lee Smith	1:00:00	Billable	Final review of complaint before sending to co-counsel for edits
1/6/2017	Seth Packrone	0:12:00	Billable	Review M. Smith comments and edits to draft of complaint

1/6/2017	Seth Packrone	0:18:00	Billable	Review co-counsel's edits to complaint re: organizational standing, among other issues
1/6/2017	Seth Packrone	0:18:00	Billable	Review and take notes on client's medical records
1/6/2017	Seth Packrone	0:06:00	Billable	Summarize notes from client's medical records
1/6/2017	Seth Packrone	0:06:00	Billable	Send comments and recommendations for remaining edits to complaint to M. Smith
1/6/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: plan for remaining edits to complaint
1/6/2017	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: remaining edits to complaint
1/6/2017	Seth Packrone	0:12:00	Billable	Edit and revise complaint pp. 6-10 based on R. Livengood's edits
1/6/2017	Seth Packrone	0:12:00	Billable	Edit and revise complaint pp. 1-6 based on R. Livengood's edits
1/6/2017	Seth Packrone	0:30:00	Billable	Edit and revise complaint pp. 11-26 based on R. Livengood's edits
1/6/2017	Seth Packrone	0:12:00	Billable	Edit and revise Brian Y. section of complaint based on R. Livengood's edits
1/6/2017	Seth Packrone	0:24:00	Billable	Edit and revise complaint pp. 27-47 based on R. Livengood's edits
1/6/2017	Seth Packrone	0:12:00	Billable	Edit and revise complaint pp. 48-56 based on R. Livengood's edits
1/6/2017	Seth Packrone	0:06:00	Billable	Review comments from M. Smith re: complaint
1/6/2017	Seth Packrone	0:06:00	Billable	Check in with R. Livengood re: outstanding issues in complaint
1/6/2017	Seth Packrone	0:12:00	Billable	Review and analyze notes from meetings with client
1/6/2017	Seth Packrone	0:06:00	Billable	Review notes from client meetings
1/6/2017	Seth Packrone	0:06:00	Billable	Finish editing draft of complaint to send to M. Smith
1/6/2017	Seth Packrone	0:06:00	Billable	Edit letters to commissioners to attach to complaint
1/6/2017	Seth Packrone	0:12:00	Billable	Edit second draft of motion to proceed under pseudonym
1/6/2017	Seth Packrone	0:12:00	Billable	Send updated filing documents to M. Smith
1/7/2017	Seth Packrone	0:12:00	Billable	Correspond with litigation team re: next steps in editing complaint and letters to commissioners
1/7/2017	Seth Packrone	0:06:00	Billable	Edit letters to commissioners based on M. Smith's comments
1/7/2017	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: final language for press release
1/8/2017	Michelle Caiola	0:06:00	Billable	Update from SP post prison visits
1/9/2017	Mary-Lee Smith	0:12:00	Billable	Email exchange w/ S.Packrone re PHV papers and revisions re same
1/9/2017	Mary-Lee Smith	0:30:00	Billable	Call with co-counsel and S.Packrone re final substantive revisions to the complaint
1/9/2017	Mary-Lee Smith	0:18:00	Billable	Call with S.Packrone re co-counsel edits
1/9/2017	Michelle Caiola	0:06:00	Billable	status update from SP re next steps for filing
1/9/2017	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: incorporating co-counsel's next round of comments
1/9/2017	Seth Packrone	0:06:00	Billable	Update M. Caiola re: plan for filing complaint
1/9/2017	Seth Packrone	0:06:00	Billable	Give C. Molholm directions re: checking legal citations in complaint
1/9/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: plan for legal checks and remaining documents to complete to file complaint
1/9/2017	Seth Packrone	0:06:00	Billable	TC with C. Conroy re: press list for upcoming filing
1/9/2017	Seth Packrone	0:18:00	Billable	Correspond with media team re: plan for filing and media strategy
1/9/2017	Seth Packrone	0:06:00	Billable	Research press contacts for press list
1/9/2017	Seth Packrone	0:12:00	Billable	Review PHV documents from co-counsel to edit for DRA attorneys
1/9/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: timing for filing PHV motions
1/9/2017	Seth Packrone	0:06:00	Billable	Correspond with J. LoCicero re: PHV applications and further edits
1/9/2017	Seth Packrone	0:12:00	Billable	Give J. Mukherjee instructions re: next steps for PHV application and certs of good standing

1/9/2017	Seth Packrone	0:12:00	Billable	Get explanation of citation edits from C. Molholm
1/9/2017	Seth Packrone	0:12:00	Billable	Correspond with DRA press team re: media contacting clients
1/9/2017	Seth Packrone	0:06:00	Billable	Follow up with whole litigation team re: press/media strategy
1/9/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: timing of PHV applications
1/9/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: plan for co-counsel weekly meetings
1/9/2017	Seth Packrone	0:30:00	Billable	TC with B. Friedman, J. LoCicero, R. Livengood, and M. Smith re: co-counsel's further edits to complaint and clarification of legal theory
1/9/2017	Seth Packrone	0:12:00	Billable	TC with M. Smith re: get instructions for next steps for filing complaint and other tasks
1/9/2017	Seth Packrone	0:12:00	Billable	Send co-counsel update on outstanding tasks for filing
1/9/2017	Seth Packrone	0:12:00	Billable	Draft and insert cage/worksheet language into new version of complaint based on call with co-counsel
1/10/2017	Mary-Lee Smith	0:12:00	Billable	Review revised language for complaint re two of co-counsel's edits from S.Packrone
1/10/2017	Mary-Lee Smith	0:12:00	Billable	Email exchange w/ S.Packrone re client's mother as a ALCU member
1/10/2017	Mary-Lee Smith	0:06:00	Billable	Email to team re media with co-counsel
1/10/2017	Mary-Lee Smith	1:30:00	Billable	Draft talking points for media
1/10/2017	Mary-Lee Smith	0:48:00	Billable	Review/revise complaint with co-counsel's edits; email questions re two comments to co-counsel
1/10/2017	Mary-Lee Smith	0:12:00	Billable	Email exchange re final revisions to the complaint w/ S.Packrone
1/10/2017	Mary-Lee Smith	1:48:00	Billable	Make final revisions/proofread complaint to prepare for filing tomorrow
1/10/2017	Mary-Lee Smith	0:12:00	Billable	Send talking points for media to S.Packrone and media team
1/10/2017	Seth Packrone	0:24:00	Billable	Edit complaint based on co-counsel's final edits
1/10/2017	Seth Packrone	0:18:00	Billable	Insert C. Molholm's legal citation edits
1/10/2017	Seth Packrone	0:18:00	Billable	Research several IDEA provisions/regulations to confirm accuracy of citations
1/10/2017	Seth Packrone	0:12:00	Billable	Get update and explanation from C. Molholm re: legal citation and proofreading edits
1/10/2017	Seth Packrone	0:18:00	Billable	Send co-counsel updated complaint and final breakdown of final edits for filing
1/10/2017	Seth Packrone	0:06:00	Billable	Update M. Smith on outstanding edits to complaint and next tasks to prepare for filing
1/10/2017	Seth Packrone	0:06:00	Billable	Follow up with C. Conroy re: team press call with co-counsel
1/10/2017	Seth Packrone	0:06:00	Billable	Update press team on remaining tasks for tomorrow's filing
1/10/2017	Seth Packrone	0:06:00	Billable	Strategy session with C. Molholm re: plan for press outreach after filing complaint
1/10/2017	Seth Packrone	0:12:00	Billable	TC with client's parent re: update on case
1/10/2017	Seth Packrone	0:12:00	Billable	Update litigation team re: call with client's mom and status of her membership
1/10/2017	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: plan for press after filing
1/10/2017	Seth Packrone	0:06:00	Billable	Get explanation of edits from C. Molholm re: edits to complaint
1/10/2017	Seth Packrone	0:18:00	Billable	Edit organizational plaintiff's retainer for DRA
1/10/2017	Seth Packrone	0:12:00	Billable	Follow up with M. Smith re: status of client's mom's membership
1/10/2017	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: contacting client's mom
1/10/2017	Seth Packrone	0:06:00	Billable	TC with R. Livengood re: update on organizational plaintiff's membership
1/10/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: remaining tasks before filing complaint
1/10/2017	Seth Packrone	0:36:00	Billable	Draft and prepare first draft of case page for DRA's website related to filing
1/10/2017	Seth Packrone	0:06:00	Billable	TC with M. Smith re: final editing schedule and prep for filing complaint
1/10/2017	Seth Packrone	0:06:00	Billable	TC with R. Livengood re: language in ADA section of complaint
1/10/2017	Seth Packrone	0:12:00	Billable	Follow up TC with client's parent re: update on lawsuit

1/10/2017	Seth Packrone	0:06:00	Billable	Correspond with co-counsel press teams re: plan for press after filing
1/10/2017	Seth Packrone	0:06:00	Billable	TC with C. Conroy re: prep for press call with co-counsel
1/10/2017	Seth Packrone	0:12:00	Billable	Press call with co-counsel press teams and C. Conroy
1/10/2017	Seth Packrone	0:06:00	Billable	Follow up TC with C. Conroy re: next steps for press
1/10/2017	Seth Packrone	0:06:00	Billable	Update M. Smith on press call and next steps
1/10/2017	Seth Packrone	0:12:00	Billable	Give J. Mukherjee instructions re: making complaint accessible for filing
1/10/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: remaining tasks for filing complaint
1/10/2017	Seth Packrone	0:06:00	Billable	Correspond with C. Conroy re: remaining press tasks for filing
1/10/2017	Seth Packrone	0:30:00	Billable	Fact check named plaintiff section of complaint
1/10/2017	Seth Packrone	0:30:00	Billable	Fact check named plaintiff section of complaint
1/10/2017	Seth Packrone	0:06:00	Billable	TC with R. Livengood re: follow up on some outstanding edits to complaint
1/10/2017	Seth Packrone	0:06:00	Billable	Give J. Mukherjee re: making press release accessible
1/10/2017	Seth Packrone	0:06:00	Billable	Finalize press release for public distribution
1/10/2017	Seth Packrone	0:12:00	Billable	Draft email to co-counsel re: handling press contacts and making documents accessible
1/10/2017	Seth Packrone	0:24:00	Billable	Input C. Molholm's edits and edits from fact check into complaint
1/10/2017	Seth Packrone	0:12:00	Billable	Correspond with R. Livengood and M. Smith re: phrasing of effective opportunity guarantee under the ADA
1/10/2017	Seth Packrone	0:18:00	Billable	Review and approve final co-counsel edits to complaint
1/10/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: plan for inputting further edits into complaint
1/10/2017	Seth Packrone	1:36:00	Billable	Final proofread and edits to a 58 page version of complaint
1/10/2017	Seth Packrone	0:12:00	Billable	Draft emails to CBS for press contacts after filing
1/10/2017	Seth Packrone	0:06:00	Billable	Review and approve co-counsel's final edits to motion to proceed under pseudonyms
1/10/2017	Seth Packrone	0:06:00	Billable	Edit social media post for press after complaint is filed
1/11/2017	Mary-Lee Smith	0:24:00	Billable	Email exchanges with S.Packrone and media team re media including email blast, webpage, and social media; follow up call with same re same
1/11/2017	Mary-Lee Smith	0:06:00	Billable	Email instructions to team re press calls and process for handling
1/11/2017	Mary-Lee Smith	0:42:00	Billable	Call with Mother Jones re NJDOC
1/11/2017	Michelle Caiola	0:12:00	Billable	check in's with SP re filing status, press updates
1/11/2017	Michelle Caiola	0:12:00	Billable	confer with potential expert
1/11/2017	Michelle Caiola	0:06:00	Billable	strategy with SP re potential expert
1/11/2017	Seth Packrone	0:18:00	Billable	Correspond with DRA's press team re: final press preparations for filing
1/11/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: final version of the complaint for filing
1/11/2017	Seth Packrone	0:06:00	Billable	Update M. Caiola on plan for filing and press today
1/11/2017	Seth Packrone	0:12:00	Billable	Draft and prepare email to send to DRBA announcing complaint
1/11/2017	Seth Packrone	0:18:00	Billable	Final pre-filing preparation, mostly related to media/press
1/11/2017	Seth Packrone	0:12:00	Billable	Review and read through emails from litigation team about final preparation for filing
1/11/2017	Seth Packrone	0:06:00	Billable	Review press list and offer suggestions to C. Conroy
1/11/2017	Seth Packrone	0:06:00	Billable	Edit and finalize accessible version of press release
1/11/2017	Seth Packrone	0:06:00	Billable	TC with M. Smith re: update on filing and related items
1/11/2017	Seth Packrone	0:06:00	Billable	Review and edit talking points for post-filing
1/11/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: update on filing of complaint

1/11/2017	Seth Packrone	0:06:00	Billable	Discuss plan for making complaint accessible with M. Smith
1/11/2017	Seth Packrone	0:06:00	Billable	Correspond with C. Conroy re: final press and media preparation
1/11/2017	Seth Packrone	0:06:00	Billable	Review talking points for potential press and media
1/11/2017	Seth Packrone	0:06:00	Billable	Research for press and media list for filing
1/11/2017	Seth Packrone	0:24:00	Billable	Correspond with press following filing of complaint
1/11/2017	Seth Packrone	0:12:00	Billable	Correspond with litigation team re: follow up calls to press and media members (WNYC and Politico NJ)
1/11/2017	Seth Packrone	0:12:00	Billable	TC with WNYC reporter
1/11/2017	Seth Packrone	0:12:00	Billable	TC and follow up with CBS Local reporter re: filing of complaint
1/11/2017	Seth Packrone	0:36:00	Billable	Draft attorney certs and review other documents for PHV motions
1/11/2017	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: next steps for meeting with client's mom
1/11/2017	Seth Packrone	0:12:00	Billable	Draft letter to client to update them on filing
1/11/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: PHV motion and letters to client
1/11/2017	Seth Packrone	0:06:00	Billable	Correspond with co-counsel re: next steps for PHVs
1/11/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: additional local NJ press coverage
1/12/2017	Mary-Lee Smith	0:06:00	Billable	Email exchange w/ team re settlement with NJDOC
1/12/2017	Mary-Lee Smith	0:12:00	Billable	Call with S.Packrone re experts for case
1/12/2017	Seth Packrone	0:12:00	Billable	Review emails from co-counsel post filing to Defendants
1/12/2017	Seth Packrone	0:12:00	Billable	Follow up with litigation team re: NJDOC's offer to listen to settlement terms
1/12/2017	Seth Packrone	0:12:00	Billable	Follow up and finalize retainer
1/12/2017	Seth Packrone	0:06:00	Billable	TC with M. Smith re: instructions for settlement demand and letters to clients
1/12/2017	Seth Packrone	0:06:00	Billable	Correspond with J. LoCicero re: settlement demand to send to Defendants
1/12/2017	Seth Packrone	0:06:00	Billable	Edit clients letters to update them on complaint filing
1/12/2017	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: agenda for next call and letters to clients
1/12/2017	Seth Packrone	0:12:00	Billable	Edit co-counsel's press release
1/12/2017	Seth Packrone	0:06:00	Billable	Correspond with co-counsel re: press release
1/13/2017	Mary-Lee Smith	0:42:00	Billable	Call w/ potential expert consultant re next steps in NJDOC re getting an expert and tasks to undertake
1/13/2017	Seth Packrone	0:06:00	Billable	Research media/press articles for case filing
1/13/2017	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: plan for next co-counsel meeting
1/13/2017	Seth Packrone	0:06:00	Billable	TC with client re: potential retaliation from NJDOC staff
1/13/2017	Seth Packrone	0:06:00	Billable	Short memo to litigation team re: updating them on tc with client and contacting clients
1/13/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: potential amicus from impacted organization
1/13/2017	Seth Packrone	0:06:00	Billable	TC with R. Livengood re: update on correspondence with clients and potential retaliation
1/13/2017	Seth Packrone	0:18:00	Billable	Finalize letters for clients
1/13/2017	Seth Packrone	0:06:00	Billable	Give J. Mukherjee directions re: what to send clients
1/13/2017	Seth Packrone	0:06:00	Billable	TC with client re: update on litigation
1/13/2017	Seth Packrone	0:06:00	Billable	Update to litigation team re: client's education
1/17/2017	Mary-Lee Smith	0:06:00	Billable	Email S.Packrone re agenda ideas for call with co-counsel
1/17/2017	Mary-Lee Smith	0:30:00	Billable	Call with co-counsel and S.Packrone re settlement, MTD, PHV and assignments to co-counsel
1/17/2017	Seth Packrone	0:12:00	Billable	Draft agenda for co-counsel meeting and send to co-counsel

1/17/2017	Seth Packrone	0:30:00	Billable	TC with litigation team (M. Smith, J. LoCicero, and R. Livengood) re: next steps in preparing for MTD and a settlement demand
1/17/2017	Seth Packrone	0:06:00	Billable	Follow up tc with M. Smith re: next assignments and getting paralegal to research experts to use in case
1/19/2017	Mary-Lee Smith	0:18:00	Billable	Review/revise settlement letter to Ds
1/19/2017	Seth Packrone	0:18:00	Billable	Review and edit settlement demand
1/19/2017	Seth Packrone	0:06:00	Billable	Send settlement demand to M. Smith with comments for further edits
1/19/2017	Seth Packrone	0:06:00	Billable	Give J. Mukherjee directions re: expert research
1/19/2017	Seth Packrone	0:06:00	Billable	Research judge assignment for case
1/19/2017	Seth Packrone	0:06:00	Billable	Send settlement demand letter to litigation team with M. Smith comments
1/19/2017	Seth Packrone	0:12:00	Billable	Review and edit PHV motions and send them to litigation team with edits
1/19/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: tomorrow's meeting with co-counsel and agenda
1/20/2017	Mary-Lee Smith	0:30:00	Billable	Call with co-counsel and S.Packrone re settlement letter and prep for MTD
1/20/2017	Mary-Lee Smith	0:12:00	Billable	Email exchange w/ S.Packrone re extension for time to respond to complaint; calculate relevant dates
1/20/2017	Seth Packrone	0:12:00	Billable	Correspond with co-counsel re: agenda for co-counsel call and next steps
1/20/2017	Seth Packrone	0:18:00	Billable	TC with litigation team (R. Livengood, J. LoCicero, M. Smith, and B. Friedman) re: Defendants' request for extension and planning for motion to dismiss
1/20/2017	Seth Packrone	0:06:00	Billable	Follow up TC with M. Smith re: next steps and exhaustion research
1/20/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: briefing schedule for motion to dismiss
1/20/2017	Seth Packrone	0:12:00	Billable	Correspond with litigation team re: Defendants' request for extension
1/21/2017	Seth Packrone	0:06:00	Billable	TC with client's mom re: meeting for update on case
1/23/2017	Mary-Lee Smith	0:12:00	Billable	Figure out timing for extension to answer and then MTD briefing
1/23/2017	Seth Packrone	0:06:00	Billable	Correspond with co-counsel re: filing PHVs
1/23/2017	Seth Packrone	0:06:00	Billable	Revise and send final PHV motions to co-counsel
1/23/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: briefing schedule for MTD and responding to Defendants' request for extension
1/24/2017	Seth Packrone	0:12:00	Billable	TC with K. Wright re: update on intakes
1/24/2017	Seth Packrone	0:06:00	Billable	Review and analyze Defendants' letter re: position on pseudonym motion
1/24/2017	Seth Packrone	0:12:00	Billable	Review DNJ model confidentiality agreement
1/24/2017	Seth Packrone	0:18:00	Billable	Correspond with M. Smith re: next steps in case including briefing schedule and pseudonym motion
1/25/2017	Mary-Lee Smith	0:18:00	Billable	Call with Judge Wolfson re confidentiality and scheduling settlement conference
1/25/2017	Mary-Lee Smith	0:12:00	Billable	Call with J.LeCircero and R.Livengood re call with judge and settlement proposal to Ds
1/25/2017	Mary-Lee Smith	0:12:00	Billable	Call with S.Packrone re call with Judge Wolfson and call with co-counsel and settlement proposal
1/25/2017	Mary-Lee Smith	0:12:00	Billable	Review settlement proposal letter and make addition and comment
1/25/2017	Seth Packrone	0:12:00	Billable	Give directions to J. Mukherjee re: setting up contacts with clients
1/25/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: call with Court
1/25/2017	Seth Packrone	0:18:00	Billable	TC with Judge Wolfson and litigation team re: settlement conference in February
1/25/2017	Seth Packrone	0:06:00	Billable	Follow up strategy session with M. Smith re: plan for settlement conference
1/25/2017	Seth Packrone	0:06:00	Billable	Revise settlement demand to send to Defendants and send to M. Smith for further edits
1/26/2017	Seth Packrone	0:06:00	Billable	Follow up on settlement demand letter and send to Defendants
1/26/2017	Seth Packrone	0:06:00	Billable	TC with client re: update on litigation
1/26/2017	Seth Packrone	0:06:00	Billable	Update M. Smith re: call with client
1/26/2017	Seth Packrone	0:06:00	Billable	TC with M. Smith re: strategy for settlement conference on Feb. 27

1/26/2017	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: checking in about next steps
1/26/2017	Seth Packrone	0:06:00	Billable	Follow up with R. Livengood re: WNYC story inquiry
1/26/2017	Seth Packrone	0:06:00	Billable	Update M. Smith re: position on WNYC story
1/26/2017	Seth Packrone	0:06:00	Billable	TC with client's father re: update on medical records
1/26/2017	Seth Packrone	0:06:00	Billable	TC with client's mother re: update
1/26/2017	Seth Packrone	0:06:00	Billable	Edit letter to DOC facility re: reason for phone call
1/27/2017	Mary-Lee Smith	0:06:00	Billable	Email exchange w/ R.Livengood re response to D counsel and standing order re calls
1/27/2017	Mary-Lee Smith	0:06:00	Billable	Review stip re extending deadlines and email to team re same
1/27/2017	Seth Packrone	0:06:00	Billable	Check in with litigation team re: DOC facility's policy on phone calls with clients
1/27/2017	Seth Packrone	0:06:00	Billable	Edit proposed scheduling order based on call with Judge Wolfson
1/27/2017	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: response to NJDOC's counsel about identifies of plaintiffs
1/30/2017	Seth Packrone	0:06:00	Billable	Review and analyze J. Mukherjee's memo draft on potential experts
1/30/2017	Seth Packrone	0:06:00	Billable	Give instructions to J. Mukherjee re: next steps in research on experts for case
1/30/2017	Seth Packrone	0:06:00	Billable	Give directions to C. Molholm re: upcoming events in case and court documents
1/30/2017	Seth Packrone	0:06:00	Billable	Follow up on correspondence with co-counsel re: recent court filings
1/31/2017	Seth Packrone	0:24:00	Billable	Draft short memo for M. Smith re: outstanding issues in case
2/1/2017	Mary-Lee Smith	0:12:00	Billable	Email exchange w/ S.Packrone re agenda for team meeting; review/approve agenda
2/1/2017	Mary-Lee Smith	0:06:00	Billable	Email exchange w/ S.Packrone re potential media and interview of clients
2/1/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: R. Livengood's WNYC proposal for story
2/1/2017	Seth Packrone	0:06:00	Billable	Review correspondence with co-counsel for next steps and task list
2/1/2017	Seth Packrone	0:06:00	Billable	Review meeting notes with co-counsel to review next steps in case
2/1/2017	Seth Packrone	0:06:00	Billable	Review exhaustion and organizational standing research to assess what further research is needed
2/1/2017	Seth Packrone	0:12:00	Billable	Draft agenda for co-counsel call on Friday
2/1/2017	Seth Packrone	0:06:00	Billable	Update attorney meeting on status of case and settlement conference to get feedback
2/1/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: next steps in case and strategy for contacting plaintiffs
2/2/2017	Seth Packrone	0:06:00	Billable	Follow up with litigation team re: agenda for Friday's meeting
2/2/2017	Seth Packrone	0:12:00	Billable	Follow up with B. Friedman re: next week's client visits
2/2/2017	Seth Packrone	0:06:00	Billable	Plan details for client visits next week
2/2/2017	Seth Packrone	0:06:00	Billable	Draft follow up with client
2/2/2017	Seth Packrone	0:06:00	Billable	Follow up with R. Livengood re: visiting client's mom
2/3/2017	Mary-Lee Smith	0:36:00	Billable	Call with co-counsel to discuss client status, settlement and possible media
2/3/2017	Mary-Lee Smith	0:12:00	Billable	Call with S.Packrone re co-counsel call and to-do items
2/3/2017	Seth Packrone	0:06:00	Billable	Give j. Mukherjee instructions re: requesting visits with clients
2/3/2017	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: co-counsel call
2/3/2017	Seth Packrone	0:06:00	Billable	Prepare for conference call with co-counsel
2/3/2017	Seth Packrone	0:06:00	Billable	Review notes on WNYC story re: next steps
2/3/2017	Seth Packrone	0:42:00	Billable	TC with R. Livengood, M. Smith, and B. Friedman re: strategy for settlement conference, next steps for confidentiality agreement
2/3/2017	Seth Packrone	0:12:00	Billable	Follow up TC with M. Smith re: strategy for client visits on Tuesday
2/6/2017	Seth Packrone	0:06:00	Billable	Follow up about voicemail from DOC facility re: visit request for client

2/6/2017	Seth Packrone	0:12:00	Billable	Give J. Mukherjee directions re: follow up with DOC facilities to set up client visits
2/6/2017	Seth Packrone	0:06:00	Billable	Get update from J. Mukherjee re: call with administrator at DOC facility
2/6/2017	Seth Packrone	0:18:00	Billable	Update B. Friedman re: details of client visits
2/6/2017	Seth Packrone	0:12:00	Billable	Prep for client visits
2/6/2017	Seth Packrone	0:06:00	Billable	Check in with R. Livengood re: agenda for client meetings with clients
2/6/2017	Seth Packrone	0:12:00	Billable	Correspond with B. Friedman re: details for client visits and prison procedures
2/6/2017	Seth Packrone	0:12:00	Billable	Prepare documents to update clients on status of case
2/6/2017	Seth Packrone	0:12:00	Billable	Draft agenda for meeting with clients
2/7/2017	Seth Packrone	0:12:00	Billable	Correspond with J. Mukherjee and speak with her re: her call with staff to schedule intake from DOC facility
2/7/2017	Seth Packrone	0:06:00	Billable	Correspond with B. Friedman re: plan for client visit and update from DOC facility
2/7/2017	Seth Packrone	1:30:00	Billable	Travel to and from client visits (total was 3.1, bill half)
2/7/2017	Seth Packrone	0:42:00	Billable	Wait at DOC facility and client meeting with Brian Y. with B. Friedman re: update him on status of case and strategy for settlement conference
2/7/2017	Seth Packrone	1:12:00	Billable	Wait and client meeting with Casey Z. at DOC facility re: update on case and stratgy for settlement conference
2/7/2017	Seth Packrone	0:06:00	Billable	TC with R. Livengood re: organization membership status
2/7/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: update on client visits
2/7/2017	Seth Packrone	0:12:00	Billable	Correspond with J. Mukherjee and speak with her re: her call with DOC facility administrator
2/7/2017	Seth Packrone	0:06:00	Billable	Correspond with B. Friedman re: plan for client visit and update from DOC facility
2/7/2017	Seth Packrone	1:30:00	Billable	Travel to and from client visits (total was 3.1, bill half)
2/7/2017	Seth Packrone	0:42:00	Billable	Wait at DOC facility and client meeting with B. Friedman re: update him on status of case and strategy for settlement conference
2/7/2017	Seth Packrone	1:12:00	Billable	Wait and client meeting with Casey Z. at DOC facility re: update on case and stratgy for settlement conference
2/7/2017	Seth Packrone	0:06:00	Billable	TC with R. Livengood re: ACLU membership
2/7/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: update on client visits
2/8/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: update on client visits and client's educational situation
2/8/2017	Seth Packrone	0:06:00	Billable	Give J. Mukherjee instructions re: following up and sending documents to client
2/8/2017	Seth Packrone	0:06:00	Billable	Edit letter to client to follow up on medical and education documents
2/8/2017	Seth Packrone	0:06:00	Billable	Follow up with J. LoCicero re: PHV motion granted and next steps and send to C. Molholm
2/8/2017	Seth Packrone	0:24:00	Billable	TC with Pam Tighe from CBS Local re: potential story on Adam X. case
2/8/2017	Seth Packrone	0:12:00	Billable	Update M. Smith re: potential CBS Local story
2/8/2017	Seth Packrone	0:12:00	Billable	Follow up with M. Smith and K. Hamilton re: potential CBS Local story
2/9/2017	Mary-Lee Smith	0:18:00	Billable	Call with S.Packrone re protective order, meet and confer and co-counsel meetings
2/9/2017	Mary-Lee Smith	0:06:00	Billable	Review draft email to team from S.Packrone; revise and send to team
2/9/2017	Seth Packrone	0:12:00	Billable	TC with M. Smith re: next steps for case and update on client visits
2/9/2017	Seth Packrone	0:24:00	Billable	Update K. Hamilton and M. Smith re: call with Pam Tighe from CBS Local
2/9/2017	Seth Packrone	0:12:00	Billable	Draft update for litigation team re: agenda for team call
2/9/2017	Seth Packrone	0:06:00	Billable	Work on talking points for CBS Local
2/10/2017	Mary-Lee Smith	0:30:00	Billable	Call with co-counsel re protective order and settlement letter to the Court
2/10/2017	Mary-Lee Smith	0:12:00	Billable	Call with S.Packrone re letter to the court and what to include
2/10/2017	Seth Packrone	0:06:00	Billable	Follow up with impacted organization re: potential amicus support in Adam X.
2/10/2017	Seth Packrone	0:42:00	Billable	Draft talking points for CBS Local story

2/10/2017	Seth Packrone	0:12:00	Billable	Review and revise talking points for CBS Local
2/10/2017	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: today's co-counsel call
2/10/2017	Seth Packrone	0:24:00	Billable	TC with M. Smith, B. Friedman, and J. LoCicero re: prep for 2/27 settlement conference and next steps in case
2/10/2017	Seth Packrone	0:12:00	Billable	Follow up tc with M. Smith re: drafting settlement letter to Judge Wolfson
2/10/2017	Seth Packrone	0:06:00	Billable	Correspond with impacted organization re: potential involvement in litigation against NJDOC
2/10/2017	Seth Packrone	0:06:00	Billable	Read and analyze impacted organization's informational materials to prepare for call with org representative
2/13/2017	Seth Packrone	0:06:00	Billable	Follow up with representative from impacted organization re: follow up about potential involvement in case
2/13/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith and K. Hamilton re: talking points for call with CBS Local
2/13/2017	Seth Packrone	0:12:00	Billable	Revise talking points based on M. Smith and K. Hamilton's comments
2/13/2017	Seth Packrone	0:12:00	Billable	Outline letter to Judge Wolfson re: status of settlement demand
2/13/2017	Seth Packrone	0:06:00	Billable	Prep for tc with CBS Local producer Pam Tighe
2/13/2017	Seth Packrone	0:06:00	Billable	TC with CBS Local producer Pam Tighe re: potential story on case
2/13/2017	Seth Packrone	0:24:00	Billable	Format and outline letter to Judge Wolfson to update Court on settlement in preparation for 2.27 settlement conference
2/13/2017	Seth Packrone	0:12:00	Billable	Draft section of letter to court based on settlement demand sent to Defendants
2/13/2017	Seth Packrone	0:06:00	Billable	Review organizational standing research completed by B. Kitchelt
2/14/2017	Mary-Lee Smith	0:06:00	Billable	Email to team re meet and confer with Ds
2/14/2017	Mary-Lee Smith	0:12:00	Billable	Receive and review standing order re phone calls with clients; email exchange with S.Packrone re revisions to same
2/14/2017	Mary-Lee Smith	0:12:00	Billable	Receive and review protective order from co-counsel; email exchange with S.Packrone re same
2/14/2017	Mary-Lee Smith	0:12:00	Billable	Email exchange with S.Packrone re role of the impacted organization in case
2/14/2017	Seth Packrone	0:12:00	Billable	Prepare for TC with impacted organization re: potential standing for litigation
2/14/2017	Seth Packrone	0:30:00	Billable	TC with impacted organization re: potential standing for Adam X. litigation
2/14/2017	Seth Packrone	0:12:00	Billable	Follow up with impacted organization re: complaint and potential next steps
2/14/2017	Seth Packrone	0:24:00	Billable	Send short memo to M. Smith re: next steps for potential standing for impacted organization
2/14/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: next steps for investigating impacted organization as organizational plaintiff
2/14/2017	Seth Packrone	0:24:00	Billable	Draft opening and background on consent decree and confidentiality order for letter to Judge Wolfson
2/14/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: call with Defendants to discuss settlement, confidentiality order, and consent order
2/14/2017	Seth Packrone	0:36:00	Billable	Draft background section in letter to Judge Wolfson
2/14/2017	Seth Packrone	0:36:00	Billable	Revise and edit letter to send to M. Smith for comments/edits
2/14/2017	Seth Packrone	0:06:00	Billable	Send draft of letter to Judge Wolfson to M. Smith with notes
2/14/2017	Seth Packrone	0:06:00	Billable	Prepare for tc with Pam Tighe from CBS Local re: potential story on Adam X.
2/14/2017	Seth Packrone	0:12:00	Billable	TC with Pam Tighe from CBS Local re: potential story on Adam X. case
2/14/2017	Seth Packrone	0:12:00	Billable	Update K. Hamilton and M. Smith re: call with Pam Tighe from CBS Local
2/14/2017	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: update on client and phone call situation at NJDOC facility
2/14/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: her edits to letter to Judge Wolfson and sending it to litigation team
2/14/2017	Seth Packrone	0:06:00	Billable	Revise letter based on M. Smith's comments
2/14/2017	Seth Packrone	0:06:00	Billable	Send rough draft of letter to Judge Wolfson to litigation team with comments for further revisions
2/14/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: process for editing confidentiality order and consent decree
2/14/2017	Seth Packrone	0:06:00	Billable	Review and edit draft consent decree from J. LoCicero
2/14/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: edits and comments to consent decree and need for confidentiality from person who schedules calls

2/15/2017	Mary-Lee Smith	0:12:00	Billable	Review revisions to consent order re phone calls from S.Packrone; finalize and email to team for review
2/15/2017	Mary-Lee Smith	0:30:00	Billable	Review protective order with S.Packrone comments/questions; make notes as to questions and possible concerns/solutions
2/15/2017	Seth Packrone	0:06:00	Billable	Send phone call consent order to M. Smith with comments/edits
2/15/2017	Seth Packrone	0:12:00	Billable	Edit consent order to ensure confidentiality in scheduling phone calls
2/15/2017	Seth Packrone	0:24:00	Billable	Review and edit confidentiality stipulation to ensure that two levels of confidentiality align
2/15/2017	Seth Packrone	0:06:00	Billable	Read and analyze FRCP 26(c)(1)(G)
2/15/2017	Seth Packrone	0:12:00	Billable	Send confidentiality stipulation to M. Smith with comments on resolving two confidentiality levels
2/15/2017	Seth Packrone	0:18:00	Billable	Research impacted organization re: potential for organizational standing
2/15/2017	Seth Packrone	0:24:00	Billable	Draft organizational standing section for potential amended complaint to add impacted organization as a party
2/16/2017	Mary-Lee Smith	1:48:00	Billable	Review/revise protective order as revised by S.Packrone; review other protective orders w/ two tier confidentiality
2/16/2017	Mary-Lee Smith	0:18:00	Billable	Review draft of amended complaint org plaintiff from S.Packrone; email to S.Packrone re same
2/16/2017	Mary-Lee Smith	0:06:00	Billable	Update agenda for meeting with co-counsel
2/16/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: next steps for reviewing confidentiality order
2/16/2017	Seth Packrone	0:06:00	Billable	Update M. Smith re: status of confidentiality order
2/16/2017	Seth Packrone	0:24:00	Billable	Rewrite confidentiality order based on M. Smith's feedback
2/16/2017	Seth Packrone	0:06:00	Billable	Review confidentiality order after changes to make it consistent with two tier approach
2/16/2017	Seth Packrone	0:12:00	Billable	Send confidentiality order to M. Smith with new section on Plaintiffs' ID information
2/16/2017	Seth Packrone	0:30:00	Billable	Draft section of potential amended complaint based on additional organizational plaintiff
2/16/2017	Seth Packrone	0:24:00	Billable	Edit additional organizational plaintiff section of potential amended complaint
2/16/2017	Seth Packrone	0:06:00	Billable	Send additional organizational plaintiff section to M. Smith with notes for next steps
2/16/2017	Seth Packrone	0:06:00	Billable	Draft agenda for co-counsel meeting and send to M. Smith for review
2/17/2017	Mary-Lee Smith	0:18:00	Billable	Call with S.Packrone re confidentiality order and two tiers of review
2/17/2017	Mary-Lee Smith	0:36:00	Billable	Work session with co-counsel re confidentiality order, consent order re phone calls, upcoming call with opposing counsel and impacted organization
2/17/2017	Mary-Lee Smith	0:12:00	Billable	Work session with S.Packrone re letter to Judge Wolfson re settlement
2/17/2017	Michelle Caiola	0:12:00	Billable	update from SP on co-counsel and press issues
2/17/2017	Seth Packrone	0:18:00	Billable	Edit confidentiality order based on M. Smith's comments/edits
2/17/2017	Seth Packrone	0:06:00	Billable	Update M. Smith re: next steps for confidentiality order
2/17/2017	Seth Packrone	0:12:00	Billable	Review agenda and M. Smith's comments re: potential organizational plaintiff and letter to judge and correspond with M. Smith re: same
2/17/2017	Seth Packrone	0:12:00	Billable	Send agenda and confidentiality stip to litigation team in preparation of today's call
2/17/2017	Seth Packrone	0:06:00	Billable	Correspond with K. Hamilton and M. Smith re: next steps for CBS
2/17/2017	Seth Packrone	0:18:00	Billable	TC with M. Smith re: scope of attorneys' eyes only protection for information
2/17/2017	Seth Packrone	0:12:00	Billable	Give J. Mukherjee directions re: finalizing pro hac vice admissions
2/17/2017	Seth Packrone	0:12:00	Billable	Follow up with J. Mukherjee re: PHV admissions
2/17/2017	Seth Packrone	0:30:00	Billable	TC with M. Smith, B. Friedman, and R. Livengood re: editing the consent and confidentiality orders
2/17/2017	Seth Packrone	0:18:00	Billable	Strategy session with M. Smith re: edits to letter and next steps for prepping for settlement conference
2/17/2017	Seth Packrone	0:18:00	Billable	Draft new language for settlement update letter to Judge Wolfson based on specific issues to remedy
2/17/2017	Seth Packrone	0:06:00	Billable	Follow up with impacted organization re: next steps for potentially joining lawsuit
2/17/2017	Seth Packrone	0:06:00	Billable	Send letter to Judge Wolfson with edits to M. Smith with comments for further edits
2/20/2017	Mary-Lee Smith	0:18:00	Billable	Review/final revisions to Confidentiality Order; email to team for final review and sending to Ds

2/20/2017	Mary-Lee Smith	0:12:00	Billable	Review/final revisions to consent order re legal calls; email to team for final review and sending to Ds
2/20/2017	Seth Packrone	0:06:00	Billable	Review consent order re; phone calls and give feedback
2/20/2017	Seth Packrone	0:12:00	Billable	Edit confidentiality order based on co-counsel's rewrite and comments
2/20/2017	Seth Packrone	0:12:00	Billable	Send confidentiality order and consent order to M. Smith with notes for further edits
2/21/2017	Mary-Lee Smith	0:30:00	Billable	Revise letter to Judge Wolfson from S.Packrone
2/21/2017	Mary-Lee Smith	0:12:00	Billable	Email exchange with team re email from Greg re confidentiality order and settlement
2/21/2017	Seth Packrone	0:24:00	Billable	Edit letter to Judge Wolfson based on comments from co-counsel
2/21/2017	Seth Packrone	0:06:00	Billable	Send letter to Judge Wolfson to M. Smith with notes for further edits
2/21/2017	Seth Packrone	0:06:00	Billable	TC with client re: update on settlement negotiations
2/21/2017	Seth Packrone	0:06:00	Billable	TC with M. Smith re: next steps with opposing counsel to get response on our settlement proposal
2/21/2017	Seth Packrone	0:06:00	Billable	Follow up with impacted organization re: next steps for potentially joining case
2/21/2017	Seth Packrone	0:06:00	Billable	Edit letter to Judge Wolfson based on M. Smith's edits
2/21/2017	Seth Packrone	0:06:00	Billable	Review and analyze opposing counsel's update on our settlement proposal response and confidentiality/consent orders
2/21/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: NJDOC's response to settlement proposal, phone call consent order, and confidentiality order
2/21/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: Defendants' response to our settlement demand
2/22/2017	Mary-Lee Smith	0:24:00	Billable	Call with Greg (Ds counsel) re confidentiality order, consent order and settlement
2/22/2017	Mary-Lee Smith	0:12:00	Billable	Work session with S.Packrone re prep for mediation
2/22/2017	Mary-Lee Smith	0:12:00	Billable	Email exchange with team re prep for mediation including role of expert
2/22/2017	Seth Packrone	0:06:00	Billable	Update M. Caiola re: settlement conference in Trenton on Monday
2/22/2017	Seth Packrone	0:06:00	Billable	Review opposing counsel's response to our settlement proposal
2/22/2017	Seth Packrone	0:06:00	Billable	Edit letter to Judge Wolfson based on opposing counsel's email
2/22/2017	Seth Packrone	0:06:00	Billable	Draft plan for next steps and send to M. Smith
2/22/2017	Seth Packrone	0:06:00	Billable	Check in with J. Mukherjee re: progress on expert research
2/22/2017	Seth Packrone	0:12:00	Billable	Respond to team re: incorporating opposing counsel's position into letter to Wolfson
2/22/2017	Seth Packrone	0:06:00	Billable	Review and respond to R. Livengood's plan for submitting and editing letter
2/22/2017	Seth Packrone	0:06:00	Billable	Check in with M. Smith re: strategy for letter to court
2/22/2017	Seth Packrone	0:24:00	Billable	Tc with M. Smith, R. Livengood, J. LoCicero, and B. Friedman with opposing counsel re: next steps for settlement conference with Judge Wolfson
2/22/2017	Seth Packrone	0:12:00	Billable	Follow up tc with M. Smith re: next steps in prepping for settlement conference
2/22/2017	Seth Packrone	0:12:00	Billable	Review correspondence from co-counsel and follow up re: outline plan for settlement conference
2/22/2017	Seth Packrone	0:06:00	Billable	Follow up with impacted organization re: next steps for discussing become a possible organizational plaintiff
2/22/2017	Seth Packrone	0:06:00	Billable	Follow up about list of potential experts with J. Mukherjee and M. Smith
2/23/2017	Mary-Lee Smith	0:18:00	Billable	Review and revise letter to Judge Wolfson with Ds addition
2/23/2017	Mary-Lee Smith	0:12:00	Billable	Review/approve letter to Judge Wolfson with further additions from Ds
2/23/2017	Mary-Lee Smith	0:18:00	Billable	Brainstorm areas of discovery for requesting during the settlement conference
2/23/2017	Mary-Lee Smith	0:48:00	Billable	work session with team re settlement conference including discussion of strategy for discovery
2/23/2017	Mary-Lee Smith	0:18:00	Billable	Call with S.Packrone re settlement conference strategy including list of discovery and expert
2/23/2017	Mary-Lee Smith	0:06:00	Billable	Email national disability expert re possibly serving as expert
2/23/2017	Seth Packrone	0:30:00	Billable	Revise settlement update letter to judge with Defendants' position
2/23/2017	Seth Packrone	0:06:00	Billable	Send revised letter with Defendants' position incorporated to M. Smith

2/23/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: updates to settlement letter to court
2/23/2017	Seth Packrone	0:18:00	Billable	Edit settlement letter to judge based on Defendants' updated version
2/23/2017	Seth Packrone	0:06:00	Billable	Send settlement letter to litigation team with notes for further feedback
2/23/2017	Seth Packrone	0:06:00	Billable	Get update from J. Mukherjee re: expert research
2/23/2017	Seth Packrone	0:06:00	Billable	Review J. Mukherjee's list of potential experts for NJDOC
2/23/2017	Seth Packrone	0:06:00	Billable	Research more on potential expert's background for him to potentially serve as expert
2/23/2017	Seth Packrone	0:12:00	Billable	Edit settlement letter to judge again based on Defendants' new version
2/23/2017	Seth Packrone	0:06:00	Billable	Send letter to litigation team with notes for further feedback and next steps
2/23/2017	Seth Packrone	0:12:00	Billable	Correspond with litigation team re: letter to Judge Wolfson based on Defendants' further edits
2/23/2017	Seth Packrone	0:12:00	Billable	Draft categories for discovery to provide to Defendants
2/23/2017	Seth Packrone	0:06:00	Billable	Revise M. Smith's discovery requests
2/23/2017	Seth Packrone	0:06:00	Billable	TC with client re: update on his education
2/23/2017	Seth Packrone	0:48:00	Billable	TC with M. Smith, B. Friedman, J. LoCicero, and R. Livengood re: strategy for settlement conference
2/23/2017	Seth Packrone	0:06:00	Billable	Follow up tc with M. Smith re: next steps in prep for settlement conference
2/23/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: follow for settlement conference
2/24/2017	Mary-Lee Smith	0:36:00	Billable	Review/revise categories for discovery in prep for settlement conference
2/24/2017	Mary-Lee Smith	0:18:00	Billable	Review and provide input on talking points for settlement conference from S.Packrone
2/24/2017	Michelle Caiola	0:12:00	Billable	update from SP re case law to toll claims and strategy session re same
2/24/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: filed letter and attachments
2/24/2017	Seth Packrone	0:06:00	Billable	Give J. Mukherjee instructions re: finalizing PHV applications
2/24/2017	Seth Packrone	0:06:00	Billable	Review filed letter based on Defendants' edits
2/24/2017	Seth Packrone	0:30:00	Billable	Draft initial categories of discovery to give to Defendants for settlement conference
2/24/2017	Seth Packrone	0:06:00	Billable	Follow up with co-counsel re: attachments to letter filed to Judge Wolfson re: update on settlement
2/24/2017	Seth Packrone	0:06:00	Billable	Send discovery categories to M. Smith for her feedback before sharing with litigation team
2/24/2017	Seth Packrone	0:06:00	Billable	Review M. Smith's edits to initial discovery categories and implement changes
2/24/2017	Seth Packrone	0:06:00	Billable	Send initial discovery categories to litigation team and ask for feedback
2/24/2017	Seth Packrone	0:06:00	Billable	Correspond with B. Friedman re: discovery categories
2/24/2017	Seth Packrone	0:42:00	Billable	Legal research re: inherently transitory exception to mootness and timing of class cert motion
2/24/2017	Seth Packrone	0:06:00	Billable	Review letters to court re: PHV payment
2/24/2017	Seth Packrone	0:12:00	Billable	Follow up with M. Smith re: inherently transitory and timing of class cert motion memo
2/24/2017	Seth Packrone	0:18:00	Billable	Draft talking points for settlement conference and send to M. Smith
2/24/2017	Seth Packrone	0:30:00	Billable	Build binder and prep for settlement conference
2/24/2017	Seth Packrone	0:06:00	Billable	Follow up with litigation team re: strategy for Monday's settlement conference
2/24/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: next steps for potential experts in case
2/26/2017	Seth Packrone	0:36:00	Billable	Review documents filed in case to prepare for settlement conference with Judge Wolfson
2/26/2017	Seth Packrone	0:54:00	Billable	Review and take notes on complaint and discovery list to prepare for settlement conference with Judge Wolfson
2/26/2017	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: discovery list to turn over to Defendants
2/27/2017	Mary-Lee Smith	0:12:00	Billable	Email exchange with S.Packrone re settlement conference
2/27/2017	Mary-Lee Smith	1:06:00	Billable	Review/research possible mutual experts

2/27/2017	Mary-Lee Smith	0:18:00	Billable	Discuss mutual experts with S.Packrone
2/27/2017	Michelle Caiola	0:12:00	Billable	update from SP re mediation with Judge
2/27/2017	Michelle Caiola	0:06:00	Billable	confer with SP re expert selection options
2/27/2017	Seth Packrone	0:06:00	Billable	Follow up with R. Livengood re: national disability consultant's expert recommendations
2/27/2017	Seth Packrone	1:30:00	Billable	Travel to and from settlement conference in Trenton, NJ (total was 182 minutes, bill half for travel)
2/27/2017	Seth Packrone	0:18:00	Billable	Check in at court for settlement conference
2/27/2017	Seth Packrone	0:30:00	Billable	Strategy session with J. LoCicero prior to settlement conference
2/27/2017	Seth Packrone	0:30:00	Billable	Wait for judge in court for settlement conference
2/27/2017	Seth Packrone	0:30:00	Billable	Settlement conference with Judge Wolfson and Defendants in chambers
2/27/2017	Seth Packrone	0:06:00	Billable	Debrief with J. LoCicero and B. Friedman following conference with Judge Wolfson
2/27/2017	Seth Packrone	0:06:00	Billable	Update M. Smith re: settlement conference and cancelling call with expert
2/27/2017	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: potential experts to propose to defendants
2/27/2017	Seth Packrone	0:12:00	Billable	Tc with M. Caiola re: update on settlement conference and next steps in case
2/27/2017	Seth Packrone	0:12:00	Billable	Review expert list from M. Smith to determine who to propose to Defendants
2/27/2017	Seth Packrone	0:18:00	Billable	TC with M. Smith re: further update on settlement conference and confer on experts we should propose
2/27/2017	Seth Packrone	0:30:00	Billable	Draft memo on experts and their backgrounds for teams to consider
2/28/2017	Mary-Lee Smith	0:12:00	Billable	Call with S.Packrone re CBS local
2/28/2017	Mary-Lee Smith	0:12:00	Billable	Call with S.Packrone re call with potential organizational plaintiff
2/28/2017	Mary-Lee Smith	0:42:00	Billable	Call with impacted organization and S.Packrone re involvement in case
2/28/2017	Mary-Lee Smith	0:12:00	Billable	Call w/ S.Packrone re agenda items for co-counsel call including impacted organization involvement and media
2/28/2017	Michelle Caiola	0:06:00	Billable	T/c re: potential expert with MLK
2/28/2017	Seth Packrone	0:06:00	Billable	Check in with M. Caiola re: potential experts for case
2/28/2017	Seth Packrone	0:06:00	Billable	TC with Pam Tighe from CBS Local re: potential story on Adam X. case
2/28/2017	Seth Packrone	0:06:00	Billable	Check in with M. Caiola re: responding to CBS Local about story
2/28/2017	Seth Packrone	0:12:00	Billable	Follow up with K. Hamilton and M. Smith re: responding to Pam Tighe at CBS Local
2/28/2017	Seth Packrone	0:06:00	Billable	Update J. Mukherjee on results from settlement conference and next steps for experts
2/28/2017	Seth Packrone	0:06:00	Billable	Check in with M. Smith re: confidentiality order next steps
2/28/2017	Seth Packrone	0:12:00	Billable	Prepare for TC with impacted organization by reviewing section of complaint on their organization
2/28/2017	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: experts to send to Defendants
2/28/2017	Seth Packrone	0:12:00	Billable	Review list of experts and background to determine who to send to Defendants
2/28/2017	Seth Packrone	0:12:00	Billable	TC with M. Smith re: plan for call with impacted organization
2/28/2017	Seth Packrone	0:42:00	Billable	TC with impacted organization re: potential participation in lawsuit
2/28/2017	Seth Packrone	0:06:00	Billable	Follow up tc with M. Smith re: next steps for potential organizational plaintiff
2/28/2017	Seth Packrone	0:06:00	Billable	Prepare for tc with Pam Tighe from CBS Local re: potential story on Adam X.
2/28/2017	Seth Packrone	0:06:00	Billable	TC with Pam Tighe re: next steps for potential CBS Local story on Adam X.
2/28/2017	Seth Packrone	0:06:00	Billable	Update K. Hamilton and M. Smith on next steps with Pam Tighe and CBS Local
3/1/2017	Mary-Lee Smith	0:12:00	Billable	Email to S.Packrone re expert costs and amending complaint
3/1/2017	Seth Packrone	0:24:00	Billable	Redraft sample retainer to send to potential organizational plaintiff
3/1/2017	Seth Packrone	0:06:00	Billable	Send sample retainer to potential organizational plaintiff with notes for potential changes to it

3/1/2017	Seth Packrone	0:12:00	Billable	TC with co-counsel re: strategy for discovery
3/1/2017	Seth Packrone	0:18:00	Billable	Send update on impacted organization and discovery/expert issues raised by co-counsel to M. Smith
3/1/2017	Seth Packrone	0:12:00	Billable	TC with client re: update on settlement
3/1/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: opposing counsel's request about confidentiality order
3/1/2017	Seth Packrone	0:06:00	Billable	Strategy session with M. Smith re: process for discovery moving forward
3/2/2017	Seth Packrone	0:12:00	Billable	TC with B. Friedman re: follow up on expert selection process and discovery
3/2/2017	Seth Packrone	0:06:00	Billable	Check in with M. Smith re: status of impacted organizational as org plaintiff
3/2/2017	Seth Packrone	0:12:00	Billable	Draft agenda for co-counsel call
3/2/2017	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: confidentiality order proposal from Defendants
3/3/2017	Mary-Lee Smith	0:18:00	Billable	Prep for co=counsel call with S.Packrone
3/3/2017	Seth Packrone	0:12:00	Billable	Follow up re: confidentiality order with litigation team and send agenda for co-counsel call
3/3/2017	Seth Packrone	0:24:00	Billable	Get update from Jessica Oppenheim re: Arc-NJ as organizational plaitniffs
3/3/2017	Seth Packrone	0:12:00	Billable	Update M. Smith re: call with Jessica Oppenheim and next steps
3/3/2017	Seth Packrone	0:06:00	Billable	TC with M. Smith re: her position on issues for conference call
3/3/2017	Seth Packrone	0:42:00	Billable	TC with litigation team (B. Friedman, J. LoCicero, and R. Livengood) re: next steps in light of settlemetn conference
3/3/2017	Seth Packrone	0:18:00	Billable	Update M. Smith re: co-counsel call and next steps in light of call
3/5/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: next steps in light of Friday's call for experts and Arc-NJ
3/6/2017	Mary-Lee Smith	0:18:00	Billable	Email exchange with S.Packrone re experts and impacted organization's standing (multiple emails)
3/6/2017	Michelle Caiola	0:06:00	Billable	update from SP re case developments
3/6/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: next steps with reaching out to experts and impacted organization
3/6/2017	Seth Packrone	0:06:00	Billable	Follow up with impacted organizations re: setting up time to discuss potential standing
3/6/2017	Seth Packrone	0:18:00	Billable	Follow up with M. Smith re: draft email to potential experts in Adam X.
3/6/2017	Seth Packrone	0:06:00	Billable	Follow up with litigation team re: defendants' edits to consent and confidentiality order
3/6/2017	Seth Packrone	0:12:00	Billable	Correspond with impacted organization re: setting up a time to discuss potential standing
3/6/2017	Seth Packrone	0:06:00	Billable	Review Defendants' edits to consent for telephone calls
3/6/2017	Seth Packrone	0:06:00	Billable	Review and analyze list of individuals from Defendants' for confidentiality order
3/6/2017	Seth Packrone	0:18:00	Billable	Update M. Smith re: next steps after call with impacted organization
3/6/2017	Seth Packrone	0:12:00	Billable	Review and edit memo on impacted organization re: potential standing
3/6/2017	Seth Packrone	0:24:00	Billable	TC with R. Livengood, B. Friedman and reps from impacted organization re: their potential standing in case
3/6/2017	Seth Packrone	0:36:00	Billable	TC with R. Livengood, B. Friedman, and J. LoCicero re: Defendants' edits to consent order, confidentiality order, and next steps for potential expeorts
3/6/2017	Seth Packrone	0:24:00	Billable	Revise and edit questionnaire for impacted organization to assess their potential standing
3/6/2017	Seth Packrone	0:12:00	Billable	Send questionnaire for impacted organization to M. Smith with notes for next steps
3/7/2017	Mary-Lee Smith	0:12:00	Billable	Discuss standing of impacted organization with S.Packrone
3/7/2017	Mary-Lee Smith	0:12:00	Billable	Discuss possible expert w/ S.Packrone
3/7/2017	Mary-Lee Smith	0:12:00	Billable	Discuss expert selection process with S.Packrone
3/7/2017	Mary-Lee Smith	0:18:00	Billable	Call with potential expert and S.Packrone re serving as neutral expert
3/7/2017	Mary-Lee Smith	0:18:00	Billable	Call with potential expert re serving as neutral expert
3/7/2017	Mary-Lee Smith	0:18:00	Billable	Review email to team re impacted organization and experts; revise to reflect latest updates and org standing info
3/7/2017	Mary-Lee Smith	0:06:00	Billable	Email exchange w/ R.Livengood re confidentiality agreement and sharing D staff names with clients

3/7/2017	Mary-Lee Smith	0:06:00	Billable	Email potential expert re call re expert
3/7/2017	Michelle Caiola	0:12:00	Billable	update from SP re new org plaintiff standing
3/7/2017	Seth Packrone	0:12:00	Billable	Give M. Caiola update on status of experts and organizational plaintiffs in case
3/7/2017	Seth Packrone	0:12:00	Billable	Research information on potential neutral experts for case
3/7/2017	Seth Packrone	0:36:00	Billable	TC with M. Smith re: impacted organization and calling experts
3/7/2017	Seth Packrone	0:12:00	Billable	TC with potential expert re: availability, rates for serving as neutral expert in case
3/7/2017	Seth Packrone	0:12:00	Billable	Reaching out to other potential experts in case
3/7/2017	Seth Packrone	0:06:00	Billable	Get update from M. Smith re: tc with potential expert
3/7/2017	Seth Packrone	0:12:00	Billable	Draft update for team on status of experts and impacted organization
3/8/2017	Mary-Lee Smith	0:12:00	Billable	Email exchange with S.Packrone re clients and experts
3/8/2017	Mary-Lee Smith	0:06:00	Billable	Call with S.Packrone re follow up with J.LeCirco re clients and MTD
3/8/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: follow up with impacted organization about questionnaire
3/8/2017	Seth Packrone	0:06:00	Billable	Tc with client's parent
3/8/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: sharing list of DOC names who know plaintiff identities with clients
3/8/2017	Seth Packrone	0:06:00	Billable	Review and edit new draft of consent order for telephone calls
3/8/2017	Seth Packrone	0:12:00	Billable	Update team re: experts and send them information on potential experts
3/8/2017	Seth Packrone	0:12:00	Billable	Tc with M. Smith re: next steps for client's parent visit, impacted organization, and briefing schedule
3/8/2017	Seth Packrone	0:12:00	Billable	Send impacted organization update to litigation team with notes for next steps
3/9/2017	Mary-Lee Smith	0:12:00	Billable	Email to J.Locicero re client's mother and MTD
3/9/2017	Seth Packrone	0:06:00	Billable	Send M. Smith update on impacted organization's outreach
3/9/2017	Seth Packrone	0:06:00	Billable	Correspond with impacted organization re: potential collaboration
3/9/2017	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: Defendants' edits to consent and confidentiality orders
3/9/2017	Seth Packrone	0:06:00	Billable	TC with press inquiry
3/9/2017	Seth Packrone	0:06:00	Billable	Prep agenda for co-counsel call tomorrow
3/9/2017	Seth Packrone	0:06:00	Billable	Prep for tc with M. Smith re: items to follow up about
3/9/2017	Seth Packrone	0:06:00	Billable	Review list of officials for confidentiality order from Defendants
3/9/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: items to consider before next co-counsel call
3/9/2017	Seth Packrone	0:12:00	Billable	Tc with client re: prepping for mediation
3/10/2017	Mary-Lee Smith	0:42:00	Billable	Call with co-counsel to discuss experts and updates on clients
3/10/2017	Seth Packrone	0:06:00	Billable	Finalize agenda based on M. Smith edits
3/10/2017	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: today's meeting and agenda
3/10/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: new consent order from Defendants
3/10/2017	Seth Packrone	0:06:00	Billable	Tc with M. Smith re: media update and plan for briefing schedule
3/10/2017	Seth Packrone	0:06:00	Billable	Tc with potential experts
3/10/2017	Seth Packrone	0:06:00	Billable	Tc with M. Smith re: update on status of experts
3/10/2017	Seth Packrone	0:06:00	Billable	Tc with potential experts
3/10/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: conference call for today
3/10/2017	Seth Packrone	0:36:00	Billable	Tc with M. Smith, J. LoCicero and B. Friedman re: next steps with experts and next steps for settlement
3/10/2017	Seth Packrone	0:06:00	Billable	Follow up tc with M. Smith re: next steps after call today

3/10/2017	Seth Packrone	0:12:00	Billable	Tc with potential organization plaintiff re: questionnaire
3/10/2017	Seth Packrone	0:06:00	Billable	Follow up with potential organization plaintiff re: questionnaire and meeting next week
3/10/2017	Seth Packrone	0:06:00	Billable	Review and edit email to opposing counsel re: update on experts
3/10/2017	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: visiting client's parent next week
3/10/2017	Seth Packrone	0:06:00	Billable	Tc with client's parent
3/13/2017	Mary-Lee Smith	0:24:00	Billable	Call with S.Packrone re experts and amending to include additional organization plaintiff
3/13/2017	Seth Packrone	0:12:00	Billable	Tc with M. Smith re: next steps for additional organization plaintiff and next steps for contacting experts
3/13/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: update on contact from experts
3/13/2017	Seth Packrone	0:06:00	Billable	Tc with parent of client to set up meeting
3/14/2017	Seth Packrone	0:06:00	Billable	Review letter submitted to court by Defendants asking for extension and emails from co-counsel
3/14/2017	Seth Packrone	0:06:00	Billable	Prepare for tc with potential court-appointed neutral expert
3/14/2017	Seth Packrone	0:06:00	Billable	Tc with potential court-appointed neutral expert
3/15/2017	Seth Packrone	0:06:00	Billable	Follow up with potential expert in case
3/15/2017	Seth Packrone	0:06:00	Billable	Follow up with parent of plaintiff and inform R. Livengood re: same
3/15/2017	Seth Packrone	0:06:00	Billable	Update M. Smith re: calling potential experts and parents of Plaintiffs
3/15/2017	Seth Packrone	0:12:00	Billable	Prep for meeting with addirional organization plaintiff
3/16/2017	Seth Packrone	0:36:00	Billable	Travel to and from meeting at co-counsel office with additional organizational plaintiff (total was 1.2, bill half)
3/16/2017	Seth Packrone	1:42:00	Billable	Meeting with additional organizational plaintiff with R. Livengood, J. LoCicero, and B. Friedman
3/16/2017	Seth Packrone	0:18:00	Billable	Follow up strategy session with litigation team re: next steps with additional organizational plaintiff
3/16/2017	Seth Packrone	0:06:00	Billable	Prepare for meeting with additional organizational plaintiff
3/16/2017	Seth Packrone	0:06:00	Billable	Update M. Smith re: next steps with additional organizational plaintiff after meeting
3/16/2017	Seth Packrone	0:18:00	Billable	Send short memo to M. Smith re: follow up from meeting with additional organizational plaintiff
3/16/2017	Seth Packrone	0:24:00	Billable	Draft memo re: case law on third party standing and organizations
3/17/2017	Seth Packrone	0:24:00	Billable	Redraft client retainer for additional organizational plaintiff
3/17/2017	Seth Packrone	0:18:00	Billable	Revise and edit client retainer for additional organizational plaintiff
3/17/2017	Seth Packrone	0:06:00	Billable	Send retainer to J. LoCicero with notes for next steps
3/21/2017	Seth Packrone	0:06:00	Billable	Tc with client re: update on case status
3/21/2017	Seth Packrone	0:12:00	Billable	Correspond with litigation team re: next steps for additional organizational plaintiff
3/21/2017	Seth Packrone	0:06:00	Billable	Follow up with additional organizational plaintiff re: next steps
3/21/2017	Seth Packrone	0:06:00	Billable	Update M. Smith re: status of additional organizational plaintiff
3/22/2017	Seth Packrone	0:06:00	Billable	Update team re: next steps for additional organizational plaintiff
3/22/2017	Seth Packrone	0:06:00	Billable	Coordinate with team re: next steps for amending complaint
3/23/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: status of the retainer for additional organizational plaintiff
3/23/2017	Seth Packrone	0:06:00	Billable	Follow up with additional organizational plaintiff re: next steps
3/23/2017	Seth Packrone	0:12:00	Billable	Tc with potential expert re: availability to serve as court-appointed neutral
3/23/2017	Seth Packrone	0:06:00	Billable	Tc with client's parent re: meeting
3/23/2017	Seth Packrone	0:06:00	Billable	Follow up with R. Livengood re: time for meeting with client's parent
3/23/2017	Seth Packrone	0:06:00	Billable	Review additional organizational plaintiff annual report
3/23/2017	Seth Packrone	0:06:00	Billable	Review retainer, finalize, and send to additional organizational plaintiff

3/23/2017	Seth Packrone	0:12:00	Billable	Follow up with litigation team re: list of experts from Defendants and letter to court to request leave to amend complaint
3/24/2017	Seth Packrone	0:06:00	Billable	Follow up with litigation team re: timeline for amending complaint
3/24/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: correspondence from experts
3/24/2017	Seth Packrone	0:06:00	Billable	Prepare for tc with litigation team re: next steps for litigation
3/24/2017	Seth Packrone	0:06:00	Billable	Review expert list sent by Defendants
3/24/2017	Seth Packrone	0:42:00	Billable	Tc with R. Livengood and B. Friedman re: strategy for Tuesday's call with court and next steps for experts
3/24/2017	Seth Packrone	0:06:00	Billable	Follow up with additional organizational plaintiff re: next steps
3/24/2017	Seth Packrone	0:06:00	Billable	Update M. Smith re: strategy with experts moving forward
3/27/2017	Mary-Lee Smith	0:30:00	Billable	Call with S.Packrone re amending complaint, experts and call with Judge tomorrow
3/27/2017	Mary-Lee Smith	0:30:00	Billable	Prep for call with judge: review memos re experts from paralegal and email S.Packrone re same
3/27/2017	Seth Packrone	0:06:00	Billable	Review correspondence with court and opposing counsel
3/27/2017	Seth Packrone	0:06:00	Billable	Prepare update agenda for M. Smith
3/27/2017	Seth Packrone	0:24:00	Billable	Tc with M. Smith re: update on Adam X. litigation and plan for call with court
3/27/2017	Seth Packrone	0:06:00	Billable	Give assignment re: expert research to K. Ruiz
3/27/2017	Seth Packrone	0:12:00	Billable	Draft assignment summary on expert research for K. Ruiz
3/27/2017	Seth Packrone	0:06:00	Billable	Review PFAL report from potential organizational plaintiff
3/27/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: PFAL report and next steps for additional organizational plaintiff
3/27/2017	Seth Packrone	0:06:00	Billable	Check in with K. Ruiz re: status of expert research
3/28/2017	Mary-Lee Smith	0:12:00	Billable	Review derivative standing research
3/28/2017	Mary-Lee Smith	0:18:00	Billable	Call with Judge Goodman
3/28/2017	Mary-Lee Smith	0:12:00	Billable	Email exchange with team re next steps on experts
3/28/2017	Mary-Lee Smith	0:06:00	Billable	Email to Ds re fee schedules for experts
3/28/2017	Seth Packrone	0:06:00	Billable	Review expert research summaries for Plaintiffs' suggested experts
3/28/2017	Seth Packrone	0:06:00	Billable	Review summaries and research on Defendants' suggested experts
3/28/2017	Seth Packrone	0:06:00	Billable	Send summaries and expert research to litigation team and M. Smith with notes for call with court
3/28/2017	Seth Packrone	0:12:00	Billable	Prepare for tc with court by reviewing previous call notes and the expert research
3/28/2017	Seth Packrone	0:18:00	Billable	Tc with court re: status of court-appointed expert selection
3/28/2017	Seth Packrone	0:06:00	Billable	Follow up with litigation team re: next steps after call with court
3/28/2017	Seth Packrone	0:06:00	Billable	Follow up with organizational plaintiff re: discussion about retainer
3/28/2017	Seth Packrone	0:06:00	Billable	Follow up with team and organizational plaintiff re: changes to retainer
3/28/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: legal theory for complaint for additional organizational plaintiff
3/28/2017	Seth Packrone	0:06:00	Billable	Tc with client's parent re: meeting
3/28/2017	Seth Packrone	0:06:00	Billable	Tc with R. Livengood re: final confidential and consent order
3/28/2017	Seth Packrone	0:12:00	Billable	Review and edit consent order re: phone calls to send to Defendants
3/28/2017	Seth Packrone	0:18:00	Billable	Review confidentiality agreement to send to Defendants
3/28/2017	Seth Packrone	0:06:00	Billable	Follow up with R. Livengood re: consent and confidentiality orders
3/29/2017	Seth Packrone	0:06:00	Billable	Check in with M. Caiola re: retainer language to propose for client
3/29/2017	Seth Packrone	0:06:00	Billable	Prep for tc with organizational plaintiff and R. Livengood re: retainer and next steps
3/29/2017	Seth Packrone	0:18:00	Billable	Tc with organizational plaintiff and R. Livengood re: retainer and information about client

3/29/2017	Seth Packrone	0:18:00	Billable	Revise retainer in light of client's requests
3/29/2017	Seth Packrone	0:12:00	Billable	Send revised retainer to team with notes on edits
3/29/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: edits to retainer
3/29/2017	Seth Packrone	0:06:00	Billable	Check in with client's parent
3/29/2017	Seth Packrone	0:06:00	Billable	Edit retainer for additional organizational plaintiff
3/29/2017	Seth Packrone	0:12:00	Billable	Begin drafting amended complaint
3/29/2017	Seth Packrone	0:06:00	Billable	Follow up with litigation team re: language in confidentiality order
3/29/2017	Seth Packrone	0:06:00	Billable	Correspond with organizational plaintiff with next steps
3/30/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: following up with clients
3/30/2017	Seth Packrone	1:30:00	Billable	Review and edit complaint to add additional organizational plaintiff as a party
3/30/2017	Seth Packrone	0:54:00	Billable	Draft standing sections for additional organizational plaintiff
3/30/2017	Seth Packrone	0:30:00	Billable	Edit new sections of complaint to add additional organizational plaintiff to complaint
3/30/2017	Seth Packrone	0:06:00	Billable	Give J. Mukherjee directions re: setting up calls with clients
3/30/2017	Seth Packrone	0:06:00	Billable	Send complaint and agenda to M. Smith with notes for further edits
3/30/2017	Seth Packrone	0:06:00	Billable	Draft agenda for meeting with co-counsel
3/30/2017	Seth Packrone	0:12:00	Billable	Update team re: contacting clients about amended complaint
3/31/2017	Mary-Lee Smith	0:54:00	Billable	Revise amended complaint; email to S.Packrone with instructions for further revisions and next steps
3/31/2017	Seth Packrone	0:06:00	Billable	Follow up with organizational plaintiff re: finalized retainer
3/31/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: draft of amended complaint
3/31/2017	Seth Packrone	0:06:00	Billable	Send agenda to team with notes for call
3/31/2017	Seth Packrone	0:06:00	Billable	Review complaint re: facts needed from organizational plaintiff
3/31/2017	Seth Packrone	0:24:00	Billable	Tc with organizational plaintiff re: facts for complaint
3/31/2017	Seth Packrone	0:24:00	Billable	Tc with B. Friedman and J. LoCicero re: next steps for amended complaint and updating clients
3/31/2017	Seth Packrone	0:12:00	Billable	Update amended complaint after tc with organizational plaintiff
3/31/2017	Seth Packrone	0:18:00	Billable	Draft short memo re: notes from call and next steps to circulate to team
4/1/2017	Seth Packrone	0:42:00	Billable	Edit amended complaint based on M. Smith's edits
4/1/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: edits to amended complaint
4/1/2017	Seth Packrone	0:06:00	Billable	Send amended complaint to team with notes for further edits
4/3/2017	Seth Packrone	0:06:00	Billable	Give J. Mukherjee directions re: setting up client calls
4/3/2017	Seth Packrone	0:06:00	Billable	Follow up with R. Livengood re: contacts at NJ prison
4/4/2017	Mary-Lee Smith	0:06:00	Billable	Email to potential expert setting up call with Ds and PS
4/4/2017	Seth Packrone	0:12:00	Billable	Review and analyze Third Party Standing research provided by co-counsel for amended complaint
4/4/2017	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: finalizing retainer
4/4/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: next steps for complaint
4/5/2017	Mary-Lee Smith	0:24:00	Billable	Call with S.Packrone re amended complaint
4/5/2017	Mary-Lee Smith	0:18:00	Billable	Call with organizational plaintiff and S.Packrone re juvenile justice
4/5/2017	Mary-Lee Smith	0:18:00	Billable	Prep for call with potential expert -- review CV and determine if questions to ask
4/5/2017	Seth Packrone	0:12:00	Billable	Update team re: status of amended complaint
4/5/2017	Seth Packrone	0:06:00	Billable	Prepare for tc with client

4/5/2017	Seth Packrone	0:18:00	Billable	Tc with client re: update on amended complaint and status of case
4/5/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: agenda for tc with potential expert
4/5/2017	Seth Packrone	0:12:00	Billable	Edit amended complaint based on co-counsel's research and send to M. Smith for her feedback
4/5/2017	Seth Packrone	0:06:00	Billable	Review co-counsel's edits to amended complaint
4/5/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: co-counsel's edits to amended complaint
4/5/2017	Seth Packrone	0:12:00	Billable	Tc with M. Smith re: next steps for amended complaint
4/5/2017	Seth Packrone	0:12:00	Billable	Incorporate co-counsel's edits into amended complaint
4/5/2017	Seth Packrone	0:06:00	Billable	Prepare amended complaint draft to send to client for their review
4/5/2017	Seth Packrone	0:06:00	Billable	Send amended complaint to client for their review
4/5/2017	Seth Packrone	0:12:00	Billable	Prepare amended complaint draft to send to litigation team for their review and edits
4/5/2017	Seth Packrone	0:12:00	Billable	Update B. Friedman and R. Livengood re: next steps for edits to amended complaint
4/6/2017	Mary-Lee Smith	0:36:00	Billable	Call with potential expert and Ds re possibility of serving as court-appointed expert
4/6/2017	Mary-Lee Smith	0:12:00	Billable	Call with R.Livengood re call with Ds and potential expert and next steps
4/6/2017	Mary-Lee Smith	0:12:00	Billable	Call with S.Packrone re selection of expert and call with potential expert and Ds
4/6/2017	Mary-Lee Smith	0:18:00	Billable	Discuss inclusion of comp ed claims in amended complaint with S.Packrone; email to team re same
4/6/2017	Seth Packrone	0:12:00	Billable	Draft agenda for co-counsel meeting and send to M. Smith for review for next steps in litigation
4/6/2017	Seth Packrone	0:12:00	Billable	Correspond with team re: amended complaint next steps
4/6/2017	Seth Packrone	0:12:00	Billable	Tc with M. Smith re: expert call and third-party standing argument
4/6/2017	Seth Packrone	0:06:00	Billable	Follow up with client re: amended complaint status
4/6/2017	Seth Packrone	0:12:00	Billable	Correspond with team re: comp ed, amended complaint, and next steps
4/6/2017	Seth Packrone	0:06:00	Billable	Tc with organizational plaintiff re: services provided
4/6/2017	Seth Packrone	0:06:00	Billable	Update M. Smith re: call with client and next steps
4/6/2017	Seth Packrone	0:36:00	Billable	Edit amended complaint based on litigation team's edits
4/6/2017	Seth Packrone	1:18:00	Billable	Revise and edit amended complaint
4/6/2017	Seth Packrone	0:18:00	Billable	Send amended complaint with latest round of edits to team with notes for next steps
4/7/2017	Mary-Lee Smith	0:36:00	Billable	Work session with co-counsel re amended complaint including comp ed claims issues and intakes for potential new plaintiffs
4/7/2017	Mary-Lee Smith	0:42:00	Billable	Final review of amended complaint and email to client w/ instructions for their review
4/7/2017	Seth Packrone	1:12:00	Billable	Edit and finalize amended complaint for filing
4/7/2017	Seth Packrone	0:06:00	Billable	Send updated draft of amended complaint to team with notes for next steps
4/7/2017	Seth Packrone	0:12:00	Billable	Update M. Smith re: status of amended complaint
4/7/2017	Seth Packrone	0:42:00	Billable	Tc with co-counsel and litigation team re: amended complaint and next steps with expert
4/7/2017	Seth Packrone	0:06:00	Billable	Follow up tc with M. Smith re: next steps for filing complaint
4/7/2017	Seth Packrone	0:06:00	Billable	Tc with client re: update on cases
4/7/2017	Seth Packrone	0:36:00	Billable	Finalize amended complaint to file based on earlier call with litigation team
4/10/2017	Seth Packrone	0:06:00	Billable	Follow up with client re: final version of amended complaint
4/10/2017	Seth Packrone	0:12:00	Billable	Review confidentiality agreement and edit it
4/10/2017	Seth Packrone	0:06:00	Billable	Review meeting notes from Friday for next action items
4/10/2017	Seth Packrone	0:06:00	Billable	Send edits to team and follow up about confidentiality agreement
4/11/2017	Seth Packrone	0:06:00	Billable	Review updated case page based on amended complaint

4/11/2017	Seth Packrone	0:06:00	Billable	Prepare for call with CBS Local reporter (media)
4/11/2017	Seth Packrone	0:06:00	Billable	Follow up with CBS local reporter (media)
4/11/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: next steps in case
4/11/2017	Seth Packrone	0:18:00	Billable	Draft update on intakes and next steps for litigation team
4/11/2017	Seth Packrone	0:18:00	Billable	Review records from previous intakes to develop next steps in outreach
4/12/2017	Seth Packrone	0:06:00	Billable	Follow up with litigation team re: call on Friday and next steps for case
4/12/2017	Seth Packrone	0:06:00	Billable	Follow up with litigation team re: next steps
4/12/2017	Seth Packrone	0:12:00	Billable	Tc with Pam Tighe (media)
4/12/2017	Seth Packrone	0:12:00	Billable	Review and edit update letter to Judge Goodman and send to team
4/12/2017	Seth Packrone	0:06:00	Billable	Review and edit final draft of update letter to Judge Goodman
4/12/2017	Seth Packrone	0:06:00	Billable	Follow up with press team re: CBS inquiry
4/13/2017	Mary-Lee Smith	0:12:00	Billable	Call with S.Packrone to prep for call re NY juvenile justice issues
4/13/2017	Mary-Lee Smith	0:54:00	Billable	Call with various public interest orgs re NY juvenile justice issues and NJ DOC case
4/14/2017	Mary-Lee Smith	0:06:00	Billable	Email to S.Packrone re proposed orders status
4/14/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: status of consent and confidentiality order
4/17/2017	Mary-Lee Smith	0:06:00	Billable	Review confidentiality order with final revisions; provide approval.
4/17/2017	Mary-Lee Smith	0:06:00	Billable	Email Ds re expert costs and payment
4/18/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: status of ECF notices in case
4/18/2017	Seth Packrone	0:06:00	Billable	Correspond with client re: update on case
4/18/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: status of phone call consent order
4/18/2017	Seth Packrone	0:06:00	Billable	Follow up with J. LoCicero re: status of phone call consent order and filing with court
4/18/2017	Seth Packrone	0:06:00	Billable	Review Defendants' response to expert letter filed with court
4/18/2017	Seth Packrone	0:18:00	Billable	Work with J. Mukherjee to determine next steps for ECF registration
4/18/2017	Seth Packrone	0:06:00	Billable	Update M. Smith re: document that must be filed by co-counsel to complete ECF registration
4/19/2017	Mary-Lee Smith	0:12:00	Billable	Email to team re contacting potential expert
4/19/2017	Seth Packrone	0:06:00	Billable	Prepare for call with client to update her on status of case
4/19/2017	Seth Packrone	0:24:00	Billable	Tc with organizational plaintiff re: update on status of case
4/19/2017	Seth Packrone	0:06:00	Billable	Update M. Smith re: client update
4/19/2017	Seth Packrone	0:06:00	Billable	Get update from J. Mukherjee re: status of ECF notices in case
4/19/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: ECF notices
4/19/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: new language in confidentiality order
4/19/2017	Seth Packrone	0:06:00	Billable	Work with J. Mukherjee re: court filings to get ECF notices in case
4/19/2017	Seth Packrone	0:06:00	Billable	Update J. LoCicero re: ECF filings
4/20/2017	Mary-Lee Smith	0:12:00	Billable	Email exchange with team re retention of potential expert
4/20/2017	Seth Packrone	0:12:00	Billable	Draft update for court-appointed neutral
4/20/2017	Seth Packrone	0:06:00	Billable	Review initial categories for discovery in preparation for next conference with court
4/20/2017	Seth Packrone	0:06:00	Billable	Update team re: discovery requests
4/20/2017	Seth Packrone	0:06:00	Billable	Redraft email to update expert on status of case and next steps
4/21/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: email to expert

4/21/2017	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: next steps for expert situation
4/22/2017	Seth Packrone	0:06:00	Billable	Check in with M. Smith re: status of Defendants' answer
4/23/2017	Seth Packrone	0:12:00	Billable	Review Defendants' answer to complaint
4/24/2017	Mary-Lee Smith	0:30:00	Billable	Review answer received from Ds on Friday; instructions to S.Packrone to collect all admissions
4/24/2017	Mary-Lee Smith	0:36:00	Billable	Call with co-counsel re experts and court call
4/24/2017	Mary-Lee Smith	0:12:00	Billable	Email experts re availability for serving as court appointed expert
4/24/2017	Mary-Lee Smith	0:12:00	Billable	Email exchange w/ S.Packrone re client updates and intakes
4/24/2017	Seth Packrone	0:42:00	Billable	Review and take notes on Defendants' answer (pp. 1-38)
4/24/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: status of expert for case
4/24/2017	Seth Packrone	0:06:00	Billable	Review and analyze affirmative defenses in Defendants' answer
4/24/2017	Seth Packrone	0:06:00	Billable	Send agenda and update to co-counsel for call this afternoon
4/24/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: Defendants' answer and admissions
4/24/2017	Seth Packrone	0:24:00	Billable	Tc with R. Livengood, B. Friedman, and M. Smith re: call on Friday with court and next steps with expert
4/24/2017	Seth Packrone	0:06:00	Billable	Follow up on call to create task list for next steps
4/24/2017	Seth Packrone	0:12:00	Billable	Check in with M. Smith re: next steps for case
4/24/2017	Seth Packrone	0:06:00	Billable	Correspond with co-counsel re: required forms for ECF notices in DNJ
4/24/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: next steps with experts
4/24/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: next steps in case
4/25/2017	Seth Packrone	0:06:00	Billable	Review NJ local rules
4/25/2017	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: drafting motion to seal
4/25/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: strategy for motion to seal
4/25/2017	Seth Packrone	0:12:00	Billable	Edit letter to court re: update on experts
4/25/2017	Seth Packrone	0:12:00	Billable	Follow up with litigation team re: expert list and motion to seal
4/26/2017	Seth Packrone	0:06:00	Billable	Follow up with R. Livengood re: motion to seal next steps
4/26/2017	Seth Packrone	0:12:00	Billable	Set up logistics for Friday's call
4/26/2017	Seth Packrone	0:06:00	Billable	Review J. Mukherjee's chart of admissions for Defendants' Answer
4/27/2017	Mary-Lee Smith	0:42:00	Billable	Prep for call with Court: review recent filings, familiarize with experts CVs, figure out proposal for next steps and draft talking points
4/27/2017	Mary-Lee Smith	0:12:00	Billable	Send talking points with plan in email to S.Packrone for his comments/input
4/27/2017	Seth Packrone	0:12:00	Billable	Review chart of Defendants' admissions and edit
4/27/2017	Seth Packrone	0:12:00	Billable	Send update email to M. Smith with next steps to prepare for conference with court
4/27/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: next steps for expert
4/27/2017	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: admissions chart tracking defendants' answer
4/28/2017	Mary-Lee Smith	0:12:00	Billable	Call with S.Packrone re proposed plan for expert selection for court
4/28/2017	Mary-Lee Smith	0:24:00	Billable	Call with Court re expert selection and scope of work
4/28/2017	Mary-Lee Smith	0:12:00	Billable	Call with S.Packrone re drafting order for scope of expert work
4/28/2017	Seth Packrone	0:30:00	Billable	Review and edit talking points for call with court re: expert
4/28/2017	Seth Packrone	0:06:00	Billable	Send revised talking points to M. Smith re: call with court and role of expert
4/28/2017	Seth Packrone	0:12:00	Billable	Review notes from conference with Judge Wolfson to determine role of joint expert
4/28/2017	Seth Packrone	0:12:00	Billable	Review Defendants' proposed experts and biographies per their request

4/28/2017	Seth Packrone	0:18:00	Billable	Prepare for call with court re: reviewing talking points and letters to judge
4/28/2017	Seth Packrone	0:12:00	Billable	Tc with M. Smith re: next steps for selecting expert and framing it for the court
4/28/2017	Seth Packrone	0:24:00	Billable	Tc with Judge Goodman and all parties re: next steps for expert selection
4/28/2017	Seth Packrone	0:06:00	Billable	Get directions from M. Smith re: drafting court order about the role of the expert
4/28/2017	Seth Packrone	0:06:00	Billable	Check in with team re: court order about role of expert
4/28/2017	Seth Packrone	0:24:00	Billable	Draft order for court to sign re: role of expert in case
4/28/2017	Seth Packrone	0:06:00	Billable	Send order to M. Smith with further notes for edits
4/28/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: communications with expert
5/1/2017	Mary-Lee Smith	0:12:00	Billable	Review/revise consent order re experts; send to team with cover email
5/1/2017	Mary-Lee Smith	0:18:00	Billable	Call w/ SP re budget/timeline for site visits
5/1/2017	Michelle Caiola	0:06:00	Billable	check in with SP re status and next steps
5/1/2017	Seth Packrone	0:12:00	Billable	Review and correspond with M. Smith re: team's approach on submitting court order to Judge Goodman about role of expert
5/1/2017	Seth Packrone	0:06:00	Billable	Review proposed order to send to team re: expert's role in litigation
5/4/2017	Seth Packrone	0:06:00	Billable	Correspond with client re: update on status of case
5/4/2017	Seth Packrone	0:24:00	Billable	Tc with client re: update on status of case
5/4/2017	Seth Packrone	0:06:00	Billable	Draft agenda for call with co-counsel tomorrow
5/4/2017	Seth Packrone	0:06:00	Billable	Follow up on recent court filings with J. Mukherjee
5/4/2017	Seth Packrone	0:12:00	Billable	Update M. Smith re: agenda and call with client to update her
5/4/2017	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: tomorrow's call, conflict checks for experts
5/5/2017	Seth Packrone	0:12:00	Billable	Follow up with J. LoCicero re: thoughts on letter to court re: conflict checks and court order about expert
5/5/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: status of tc with co-counsel call
5/5/2017	Seth Packrone	0:18:00	Billable	Tc with B. Friedman, J. LoCicero, and R. Livengood and M. Smith re: next steps for expert selection and documents to submit to court
5/5/2017	Seth Packrone	0:06:00	Billable	Tc with M. Smith re: requesting visits at NJDOC facilities
5/5/2017	Seth Packrone	0:18:00	Billable	Follow up with litigation team re: contacting prisons for visits and letter to court responding to defendants' letter
5/5/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: next call with expert
5/5/2017	Seth Packrone	0:06:00	Billable	Review Defendants' letter and our letter responding to it
5/8/2017	Michelle Caiola	0:06:00	Billable	update from SP re expert selection and organizational plaintiffs
5/8/2017	Seth Packrone	0:06:00	Billable	Follow up with co-counsel re: client visits and intake
5/8/2017	Seth Packrone	0:06:00	Billable	Review correspondence with Defendants and expert
5/8/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: order for judge re: role of expert
5/9/2017	Mary-Lee Smith	0:18:00	Billable	Call w/ expert to discuss retainer and scope of work
5/9/2017	Seth Packrone	0:06:00	Billable	Correspond with team and expert re: next steps and phone call to lay out issues
5/9/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: Judge Goodman's order and next call with court
5/9/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: court order about role of expert
5/9/2017	Seth Packrone	0:12:00	Billable	Correspond with team re: list of discovery items for expert
5/10/2017	Seth Packrone	0:12:00	Billable	Review intake summaries and send response to co-counsel
5/10/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: draft of court order on expert
5/10/2017	Seth Packrone	0:06:00	Billable	Review and edit court order
5/10/2017	Seth Packrone	0:06:00	Billable	Draft email for defendants re: court order on experts

5/10/2017	Seth Packrone	0:06:00	Billable	Review Defendants' email re: role of DOE and propose language for order to M. Smith
5/10/2017	Seth Packrone	0:06:00	Billable	Edit visit requests
5/10/2017	Seth Packrone	0:12:00	Billable	Follow up with M. Smith re: editing order to include NJDOE
5/10/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: maintaining confidentiality and sending intake requests to non-clients
5/10/2017	Seth Packrone	0:06:00	Billable	Give J. Mukherjee directions re: timing of client visits and intakes and locations
5/10/2017	Seth Packrone	0:06:00	Billable	Correspond with impacted organization re: checking in
5/10/2017	Seth Packrone	0:06:00	Billable	Confirm current locations of clients and intake
5/10/2017	Seth Packrone	0:06:00	Billable	Correspond with B. Friedman re: coordinating client visits and intake
5/10/2017	Seth Packrone	0:12:00	Billable	Edit and send edited to team with notes for submitting to Defendants
5/11/2017	Mary-Lee Smith	0:12:00	Billable	Call w/ R. Livengood in prep for call w/ expert and Ds
5/11/2017	Mary-Lee Smith	0:24:00	Billable	Call w/ experts and Ds
5/11/2017	Mary-Lee Smith	0:12:00	Billable	Call w/ SP re call w/ experts and Ds update
5/11/2017	Seth Packrone	0:06:00	Billable	Follow up with J. Mukherjee re: status of visit requests for clients and intake
5/11/2017	Seth Packrone	0:06:00	Billable	Draft agenda for call with co-counsel tomorrow
5/11/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: expert call
5/11/2017	Seth Packrone	0:06:00	Billable	Review and edit talking points for call with expert
5/11/2017	Seth Packrone	0:06:00	Billable	Send agenda to team with notes for next steps
5/11/2017	Seth Packrone	0:06:00	Billable	Follow up on Defendants' email re: scope of order
5/11/2017	Seth Packrone	0:12:00	Billable	Tc with M. Smith re: call with expert and next steps
5/12/2017	Seth Packrone	0:18:00	Billable	Tc with impacted organization re: potential intakes that are impacted by special education issues
5/12/2017	Seth Packrone	0:36:00	Billable	Finalize visits for Friday with clients and intake
5/12/2017	Seth Packrone	0:06:00	Billable	Correspond with B. Friedman re: intakes/visits at prisons
5/12/2017	Seth Packrone	0:12:00	Billable	Correspond with team re: opposing counsel's proposed edits to expert order
5/12/2017	Seth Packrone	0:30:00	Billable	Tc with co-counsel (R. Livengood, B. Friedman, and J. LoCicero) re: next steps for court order and interviewing plaintiffs/potential plaintiffs
5/12/2017	Seth Packrone	0:18:00	Billable	Correspond and update M. Smith after meeting about next steps for expert order and intakes
5/12/2017	Seth Packrone	0:06:00	Billable	Compile notes from meeting with co-counsel to send to M. Smith
5/12/2017	Seth Packrone	0:24:00	Billable	Prep materials and parpe for intake and client visits on Monday
5/13/2017	Seth Packrone	0:12:00	Billable	Correspond with team re: order to file and thoughts for email to opposing counsel and correspond with M. Smith re: same
5/14/2017	Seth Packrone	0:06:00	Billable	Edit order and send to co-counsel to file on Monday
5/15/2017	Seth Packrone	0:36:00	Billable	Travel to prison facility to conduct intake/visit client (total 1.3, bill half)
5/15/2017	Seth Packrone	0:06:00	Billable	Travel from prison facility to impacted organization (bill half, total was .2)
5/15/2017	Seth Packrone	0:36:00	Billable	Travel back home from impacted organization's office from conducting intakes/client visits (total was 1.3, bill half)
5/15/2017	Seth Packrone	0:12:00	Billable	Processing at prison facility to conduct intake
5/15/2017	Seth Packrone	1:06:00	Billable	Intake at prison facility
5/15/2017	Seth Packrone	0:18:00	Billable	Processing at prison facility ad seg unit to visit client
5/15/2017	Seth Packrone	0:30:00	Billable	Client visit with re: update on case
5/15/2017	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: edits to letter to court to accompnay order and checking in about correspondence with opposing counsel
5/15/2017	Seth Packrone	0:06:00	Billable	Processing at prison facility for client visit
5/15/2017	Seth Packrone	0:54:00	Billable	Client visit re: update on case

5/15/2017	Seth Packrone	0:24:00	Billable	Processing/waiting at DOC facility for visit with client
5/15/2017	Seth Packrone	0:12:00	Billable	Review and edit discovery proposal to send to expert
5/15/2017	Seth Packrone	0:48:00	Billable	Client visit re: update on status of case
5/15/2017	Seth Packrone	0:06:00	Billable	Review correspondence with team re: scope of expert work and correspondence from opposing counsel
5/15/2017	Seth Packrone	0:12:00	Billable	Review, analyze, critique scope of work shared by expert
5/15/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: reactions to expert scope of work
5/15/2017	Seth Packrone	0:06:00	Billable	Update M. Smith on visits and next steps for discovery proposal to expert
5/16/2017	Michelle Caiola	0:12:00	Billable	update from SP re prison visits, next steps, staffing
5/16/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: next steps for editing discovery list
5/17/2017	Seth Packrone	0:18:00	Billable	Review, analyze, and comment on discovery plan proposal for expert
5/17/2017	Seth Packrone	0:12:00	Billable	Review, analyze, and take notes on neutral expert's Work Statement
5/17/2017	Seth Packrone	0:30:00	Billable	Summarize issues with neutral expert's proposal and summary list and prepare short memo re: same for M. Smith
5/17/2017	Seth Packrone	0:06:00	Billable	Review Defendants' letter to court with attached proposed order
5/17/2017	Seth Packrone	0:18:00	Billable	Tc with litigation team (M. Smith, R. Livengood, J. LoCicero, and B. Friedman) re: responding to neutral expert's statement of work and developing discovery proposal
5/17/2017	Seth Packrone	0:12:00	Billable	Follow up tc with M. Smith re: next steps for preparing materials for neutral expert
5/17/2017	Seth Packrone	0:18:00	Billable	Redraft discovery list in light of tc with co-counsel
5/17/2017	Seth Packrone	0:12:00	Billable	Send discovery list to M. Smith re: notes for next steps and drafting response to Gagnon's Statement of Work
5/17/2017	Seth Packrone	0:06:00	Billable	Draft update email for co-counsel re: discovery list and response to neutral expert
5/17/2017	Seth Packrone	0:48:00	Billable	Draft response to neutral expert's Statement of Work
5/17/2017	Seth Packrone	0:12:00	Billable	Review/edit response to neutral expert's Statement of Work
5/17/2017	Seth Packrone	0:06:00	Billable	Send response to neutral expert to M. Smith with notes for next steps on editing
5/17/2017	Seth Packrone	0:12:00	Billable	Draft talking points and questions for C. Brandt-Young for meet and confer based on last call with ETA and Batch 9 moved sites reports
5/18/2017	Mary-Lee Smith	0:42:00	Billable	Send revised retainer to neutral expert -- multiple rounds of revisions
5/18/2017	Seth Packrone	0:06:00	Billable	Review discovery list and letter draft sent to co-counsel for their edits
5/18/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith and J. Mukherjee re: attorney list rules in D.N.J.
5/18/2017	Seth Packrone	0:42:00	Billable	Edit discovery list for neutral expert based on co-counsel's comments/edits
5/18/2017	Seth Packrone	0:06:00	Billable	Send discovery list to litigation team with question about site visits
5/18/2017	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: edits to site visit list on discovery proposal for neutral expert
5/18/2017	Seth Packrone	0:24:00	Billable	Finalize response to neutral expert's Statement of Work and input B. Friedman's edits into document and send to M. Smith for review
5/18/2017	Seth Packrone	0:12:00	Billable	Finalize discovery list to send to Gagnon
5/18/2017	Seth Packrone	0:12:00	Billable	Prep materials (response to Statement of Work and discovery list) to send to neutral expert
5/18/2017	Seth Packrone	0:06:00	Billable	Draft agenda for next co-counsel meeting
5/18/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: next co-counsel meeting and prepping for next call with court
5/18/2017	Seth Packrone	0:06:00	Billable	Review/analyze co-counsel's edits to response to neutral expert's Statement of Work
5/19/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: neutral expert's response to our discovery proposal and letter
5/19/2017	Seth Packrone	0:06:00	Billable	Correspond with legal team re: follow up with neutral expert about rates and role
5/19/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: Defendants' proposal mistakenly filed as a consent order
5/19/2017	Seth Packrone	0:06:00	Billable	Edit letter for R. Livengood to submit to court indicating that proposal was not a consent order
5/22/2017	Seth Packrone	0:42:00	Billable	Review, analyze, and type up short memo re: potential client intake and next steps

5/22/2017	Seth Packrone	0:12:00	Billable	Summarize potential client visit for litigation team
5/22/2017	Seth Packrone	0:18:00	Billable	Type up and analyze notes from visit with client to send to team
5/22/2017	Seth Packrone	0:12:00	Billable	Type and analyze notes from visit with client to send to team for their feedback
5/22/2017	Seth Packrone	0:06:00	Billable	Research potential new intakes from meeting with client
5/22/2017	Seth Packrone	0:12:00	Billable	Type and analyze notes from visit with client to send to team and get feedback on next steps
5/22/2017	Seth Packrone	0:18:00	Billable	Review client's educational records and draft plan for follow up
5/22/2017	Seth Packrone	0:24:00	Billable	Send litigation team notes on client meetings/intake and guidance for next steps in case
5/22/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: next steps and potential follow up on situation for client
5/23/2017	Mary-Lee Smith	0:12:00	Billable	Email exchange w/ S.Packrone re neutral expert's email to team
5/23/2017	Mary-Lee Smith	0:12:00	Billable	Email exchange w/ lit team re Gagnon's email and response to same
5/23/2017	Seth Packrone	0:18:00	Billable	Review neutral expert's proposal and attachment re: requests for information DOC and DOE
5/23/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: next steps for working with expert
5/23/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: neutral expert's plan for discovery
5/23/2017	Seth Packrone	0:06:00	Billable	Draft response to neutral expert re: plan for discovery
5/23/2017	Seth Packrone	0:06:00	Billable	Draft agenda for weekly call to prep for call with court
5/23/2017	Seth Packrone	0:06:00	Billable	Send agenda to M. Smith with notes for next meeting
5/24/2017	Michelle Caiola	0:06:00	Billable	update from SP re counsel/expert dispute
5/24/2017	Seth Packrone	0:12:00	Billable	Correspond with team re: today's call
5/24/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: expert's role in case
5/24/2017	Seth Packrone	0:06:00	Billable	Prep for call with team re: call with court and scope of role for expert
5/24/2017	Seth Packrone	0:42:00	Billable	Tc with M. Smith, B. Friedman, B. Silverman, and R. Livengood re: next steps for call with court and scope of expert's work
5/24/2017	Seth Packrone	0:06:00	Billable	Follow up tc with M. Smith re: next steps for case
5/24/2017	Seth Packrone	0:30:00	Billable	Revise timeline for expert, costs, and correspond with M. Smith re: same
5/25/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: agenda for call with court
5/25/2017	Seth Packrone	0:12:00	Billable	Correspond with team re: plan for call with court
5/25/2017	Seth Packrone	0:12:00	Billable	Revise expert timeline based on M. Smith's feedback
5/25/2017	Seth Packrone	0:06:00	Billable	Send revised timeline to team for feedback
5/25/2017	Seth Packrone	0:06:00	Billable	Follow up with co-counsel re: edits to timeline and whether to send to expert
5/25/2017	Seth Packrone	0:06:00	Billable	Revise and follow up re: talking points for call with court
5/25/2017	Seth Packrone	0:24:00	Billable	Tc with Court and counsel re: expert order and next steps for expert discovery
5/25/2017	Seth Packrone	0:12:00	Billable	Follow up tc with B. Silverman, R. Livengood, and M. Smith re: timeline and number of facilities to propose to court and expert
5/25/2017	Seth Packrone	0:06:00	Billable	Check in with M. Smith re: prepping for call with expert
5/25/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: next steps with expert to finalize timeline and cap for work
5/25/2017	Seth Packrone	0:06:00	Billable	Follow up with expert and opposing counsel re: time to speak about timeline and cap
5/25/2017	Seth Packrone	0:06:00	Billable	Review notes from call with court and perform follow up
5/25/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: finalize agenda for tomorrow's call with expert and opposing counsel
5/25/2017	Seth Packrone	0:30:00	Billable	Review and compare neutral expert's discovery list to what we submitted and provide comments feedback re: same
5/25/2017	Seth Packrone	0:12:00	Billable	Draft plan for call with expert and opposing counsel
5/25/2017	Seth Packrone	0:18:00	Billable	Send M. Smith update re: plan for call with expert and opposing counsel

5/26/2017	Seth Packrone	0:12:00	Billable	Prep for call with M. Smith, neutral expert, and G. Bueno
5/26/2017	Seth Packrone	0:48:00	Billable	Tc with expert, opposing counsel (G. Bueno), and M. Smith
5/26/2017	Seth Packrone	0:06:00	Billable	Follow up tc with M. Smith re: next steps for case
5/26/2017	Seth Packrone	0:36:00	Billable	Draft notes and next steps for finalizing timeline and hours for expert's work
5/27/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: next steps order and letter to court and updating team on call with expert and opposing counsel
5/27/2017	Seth Packrone	0:06:00	Billable	Update team re: next steps in case after call with expert and order/letter for court
5/29/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: next steps in case
5/30/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: proposal for expert and potential budget
5/30/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: meeting to discuss budget
5/30/2017	Seth Packrone	0:24:00	Billable	Draft letter to court re: updated order and timeline for expert
5/30/2017	Seth Packrone	0:12:00	Billable	Draft email to opposing counsel to propose sites for expert to visit
5/30/2017	Seth Packrone	0:12:00	Billable	Review expert's discovery proposal and send comments to rest of team
5/30/2017	Seth Packrone	0:06:00	Billable	Send updated letter and discovery list to M. Smith for feedback
5/30/2017	Seth Packrone	0:18:00	Billable	Draft proposed consent order for expert's schedule for document production
5/30/2017	Seth Packrone	0:06:00	Billable	Edit letter to court to attach to order
5/30/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: edits to letter/order to file with court
5/30/2017	Seth Packrone	0:06:00	Billable	Edit letter/order to submit to court
5/30/2017	Seth Packrone	0:06:00	Billable	Revise discovery experts' discovery categories
5/30/2017	Seth Packrone	0:06:00	Billable	Send discovery categories with comments to team with request for further edits
5/30/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: edits to order/letter
5/30/2017	Seth Packrone	0:06:00	Billable	Edit proposed order to submit to court
5/30/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: plan for call with opposing counsel tomorrow
5/30/2017	Seth Packrone	0:18:00	Billable	Edit/finalize discovery categories with team's comments incorporated
5/30/2017	Seth Packrone	0:06:00	Billable	Send discovery finalized discovery categories to M. Smith with notes for sending to expert
5/30/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: plan for submitting discovery categories to expert
5/31/2017	Seth Packrone	0:06:00	Billable	Edit order/letter based on team's feedback
5/31/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: status of order/letter to file with court
5/31/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: status of order/letter
5/31/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: follow up from call with opposing counsel about schedule and budget for expert's work
5/31/2017	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: opposing counsels' concerns on order
5/31/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: follow up with co-counsel on budget for expert
5/31/2017	Seth Packrone	0:12:00	Billable	Edit/finalize order/letter based on opposing counsel's feedback
5/31/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: plan for filing order/letter with court
5/31/2017	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: co-counsel filing order/letter with court
5/31/2017	Seth Packrone	0:06:00	Billable	Give J. Mukherjee instructions re: setting up call with client
6/1/2017	Mary-Lee Smith	0:12:00	Billable	Review draft agenda for team meeting including proposed timeline and budget for expert; discuss w/ SP
6/1/2017	Mary-Lee Smith	0:24:00	Billable	Call w/J. LeCierco re budget for expert
6/1/2017	Seth Packrone	0:06:00	Billable	Give L. Ackerson directions re: setting up call with client
6/1/2017	Seth Packrone	0:12:00	Billable	Review client's records

6/1/2017	Seth Packrone	0:12:00	Billable	Correspond with team re: strategy moving forward with contacting opposing counsel about client issues
6/1/2017	Seth Packrone	0:12:00	Billable	Check in with L. Ackerson re: letters to clients and updating intake notes
6/1/2017	Seth Packrone	0:12:00	Billable	Give L. Ackerson direction re: next steps in case
6/1/2017	Seth Packrone	0:06:00	Billable	Draft agenda and send to team re: next steps for budget and timeline
6/2/2017	Mary-Lee Smith	0:24:00	Billable	Review timeline and budget for expert from SP; comment on both strategy for developing and actual outcome
6/2/2017	Mary-Lee Smith	0:18:00	Billable	Discuss timeline and budget for expert w/ SP
6/2/2017	Mary-Lee Smith	0:06:00	Billable	Discuss updating budget for expert w/ SP
6/2/2017	Mary-Lee Smith	0:48:00	Billable	Team call re next steps for expert including budget and timeline
6/2/2017	Seth Packrone	0:06:00	Billable	Edit/send agenda to team for co-counsel call
6/2/2017	Seth Packrone	0:12:00	Billable	Tc with client re: status of case
6/2/2017	Seth Packrone	0:18:00	Billable	Tc with M. Smith re: update on budget/timeline/site visit proposal
6/2/2017	Seth Packrone	0:06:00	Billable	Tc with M. Smith re: instructions for updating budget proposal for expert
6/2/2017	Seth Packrone	0:48:00	Billable	Tc with ACLU (J. LoCicero, R. Livengood) and Proskauer (B. Silverman, B. Friedman) and M. Smith re: next steps for working with expert
6/2/2017	Seth Packrone	1:00:00	Billable	Draft new budget/timeline proposal for expert based on expert's proposals
6/2/2017	Seth Packrone	0:12:00	Billable	Send budget/timelinereproposal to M. Smith with notes for strategy for developing it
6/5/2017	Mary-Lee Smith	0:18:00	Billable	Review categories of discovery/docs that expert should get for his assessment from SP; add further categories
6/5/2017	Mary-Lee Smith	0:12:00	Billable	Review various consent orders re expert from SP
6/5/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: next steps for budget proposal
6/5/2017	Seth Packrone	0:18:00	Billable	Review/edit proposed budget and timeline
6/5/2017	Seth Packrone	0:12:00	Billable	Send revised budget/timeline to M. Smith with notes for next steps
6/5/2017	Seth Packrone	0:18:00	Billable	Draft email and compile orders to send to expert
6/5/2017	Seth Packrone	0:18:00	Billable	Review/analyze expert's updated discovery categories to be submitted to Defendants
6/5/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: meeting to discuss budget/timeline
6/5/2017	Seth Packrone	0:12:00	Billable	Send analysis of discovery categories to M. Smith with notes for next steps
6/6/2017	Mary-Lee Smith	0:42:00	Billable	Review joint retainer for expert w/ all comments/edits; add further edits and respond to comments; attempt to finalize/cleanup for Ds review
6/6/2017	Mary-Lee Smith	0:24:00	Billable	Review/revise joint portions of CMC statement
6/6/2017	Mary-Lee Smith	0:30:00	Billable	Call w/ co-counsel re budget for expert
6/6/2017	Mary-Lee Smith	0:12:00	Billable	Email exchange w/ SP retainer and expert budget as well as client issue
6/6/2017	Seth Packrone	0:18:00	Billable	Review/analyze joint retainer for expert from defendants
6/6/2017	Seth Packrone	0:18:00	Billable	Compile analysis/comments on joint retainer for expert and send to M. Smith with notes for further edits
6/6/2017	Seth Packrone	0:12:00	Billable	Draft email to G. Bueno
6/6/2017	Seth Packrone	0:06:00	Billable	Tc with M. Smith re: updated expert budget from co-counsel
6/6/2017	Seth Packrone	0:06:00	Billable	Edit budget based on co-counsel's and internal comments and circulate to team
6/6/2017	Seth Packrone	0:30:00	Billable	Tc with litigation team (M. Smith, B. Silverman, and B. Friedman, R. Livengood, and J. LoCicero) re: next steps for budget
6/6/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: retainer/budget/email about client issue
6/7/2017	Mary-Lee Smith	0:24:00	Billable	Call w/ opposing counsel, SP and RL re scope of expert's work
6/7/2017	Mary-Lee Smith	0:12:00	Billable	Call w/ SP re scope of work issue
6/7/2017	Mary-Lee Smith	0:12:00	Billable	Review final retainer, scope of work, and cover email to opposing counsel from SP
6/7/2017	Mary-Lee Smith	0:18:00	Billable	Call w/ lit team re final retainer

6/7/2017	Seth Packrone	0:12:00	Billable	Review retainer with edits from R. Livengood
6/7/2017	Seth Packrone	0:06:00	Billable	Draft analysis for M. Smith on joint retainer
6/7/2017	Seth Packrone	0:24:00	Billable	Tc with opposing counsel and M. Smith, R. Livengood, and B. Friedman re: scope of expert's work
6/7/2017	Seth Packrone	0:12:00	Billable	Follow up tc with M. Smith re: next steps for joint retainer and other follow up items
6/7/2017	Seth Packrone	0:30:00	Billable	Edit joint retainer/work plan to circulate to opposing counsel
6/7/2017	Seth Packrone	0:12:00	Billable	Draft email to opposing counsel to send with joint retainer
6/7/2017	Seth Packrone	0:06:00	Billable	Send joint retainer to M. Smith with notes for next steps
6/8/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: edits to joint retainer
6/8/2017	Seth Packrone	0:48:00	Billable	Finalize retainer to send to opposing counsel with co-counsel's comments incorporated
6/8/2017	Seth Packrone	0:06:00	Billable	Send retainer to M. Smith for her review
6/8/2017	Seth Packrone	0:06:00	Billable	Confer with M. Smith re: next steps for retainer and budget/timeline
6/8/2017	Seth Packrone	0:06:00	Billable	Follow up with litigation team re: edits to expert's discovery list
6/8/2017	Seth Packrone	0:06:00	Billable	Send draft email to team re: client issue
6/8/2017	Seth Packrone	0:06:00	Billable	Draft agenda for co-counsel meeting and follow up with M. Smith about it
6/8/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: plan to send order/budget/timeline to expert
6/9/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: plan for co-counsel meeting this afternoon
6/9/2017	Seth Packrone	0:12:00	Billable	Draft emails to opposing counsel and expert re: follow up on timeline and order
6/9/2017	Seth Packrone	0:24:00	Billable	Finalize retainer/timeline to send to expert
6/9/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: plan for sharing timeline/budget with expert
6/9/2017	Seth Packrone	0:06:00	Billable	Review/edit letter to court from opposing counsel
6/9/2017	Seth Packrone	0:06:00	Billable	Draft email to opposing counsel re: edits to letter to court
6/9/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: second draft of letter to court from opposing counsel
6/9/2017	Seth Packrone	0:12:00	Billable	Edit/draft letter to potential client re: follow up on intake
6/9/2017	Seth Packrone	0:06:00	Billable	Correspond with L. Ackerson re: follow up on intake letter to potential client
6/9/2017	Seth Packrone	0:06:00	Billable	Review/edit new version of email to expert
6/12/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: follow up items and next steps for intakes/discovery
6/12/2017	Seth Packrone	0:06:00	Billable	Review letter to potential client and advise L. Ackerson re: same
6/13/2017	Mary-Lee Smith	0:18:00	Billable	Review proposed order to Court re expert (scope and timeline) from SP; make revisions re same
6/13/2017	Seth Packrone	0:06:00	Billable	Correspond with organizational client re: update on case
6/13/2017	Seth Packrone	0:30:00	Billable	Draft proposed order for expert's role and timeline in case
6/13/2017	Seth Packrone	0:12:00	Billable	Send order to M. Smith with notes for next steps
6/13/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: next steps in case
6/13/2017	Seth Packrone	0:06:00	Billable	Check in with L. Ackerson re: status of records requests for intakes
6/13/2017	Seth Packrone	0:06:00	Billable	Follow up with litigation team re: next steps for order
6/13/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: next steps for submitting order and finalizing timeline for expert
6/14/2017	Mary-Lee Smith	0:12:00	Billable	Discuss starting site visits in August w/ SP
6/14/2017	Mary-Lee Smith	0:12:00	Billable	Review/revise letter to court re site visits
6/14/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: edits to order
6/14/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: next steps for order for expert's timeline and role in case

6/14/2017	Seth Packrone	0:06:00	Billable	Draft email to opposing counsel with order attached
6/14/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: submitting order today
6/14/2017	Seth Packrone	0:06:00	Billable	Edit order based on team's comments and send back to team
6/14/2017	Seth Packrone	0:06:00	Billable	Finalize proposed order to share with opposing counsel
6/14/2017	Seth Packrone	0:06:00	Billable	Check in with M. Smith re: plan for submitting proposed order to court
6/14/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: ESY in NJDOC facilities and starting site visits in August
6/14/2017	Seth Packrone	0:24:00	Billable	Draft letter to court re: starting visits in August and submitting proposed order
6/14/2017	Seth Packrone	0:12:00	Billable	Revise/edit letter to court
6/14/2017	Seth Packrone	0:06:00	Billable	Send letter to court to M. Smith for feedback/edits with notes for next steps
6/14/2017	Seth Packrone	0:06:00	Billable	Correspond with opposing counsel re: order/next steps
6/14/2017	Seth Packrone	0:12:00	Billable	Review/edit letter to court based on co-counsel edits
6/14/2017	Seth Packrone	0:06:00	Billable	Read and analyze response from opposing counsel
6/14/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: plan for editing letter and submitting that with order to court
6/14/2017	Seth Packrone	0:06:00	Billable	Correspond with litigation team re: plan for submitting letter/order to court
6/14/2017	Seth Packrone	0:36:00	Billable	Finalize letter/order and send to co-counsel to file (including converting from consent to proposed order)
6/14/2017	Seth Packrone	0:06:00	Billable	Review translation service for release/retainer
6/14/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Caiola re: plan for translation service
6/15/2017	Seth Packrone	0:06:00	Billable	Check in with M. Caiola re: status of case
6/15/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: correspond with opposing counsel about client issue
6/15/2017	Seth Packrone	0:06:00	Billable	Correspond with opposing counsel re: client issue
6/15/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: agenda and team meeting
6/15/2017	Seth Packrone	0:06:00	Billable	Draft agenda for co-counsel meeting tomorrow
6/16/2017	Mary-Lee Smith	0:12:00	Billable	Email exchange w/ SP re call w/ co-counsel
6/16/2017	Mary-Lee Smith	0:24:00	Billable	Call w/ team re discovery, expert and site visits
6/16/2017	Seth Packrone	0:06:00	Billable	Correspond with org. client plan for update
6/16/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: plan for call with co-counsel
6/16/2017	Seth Packrone	0:06:00	Billable	Send agenda to team to prep for co-counsel call
6/16/2017	Seth Packrone	0:06:00	Billable	Correspond with B. Silverman re: plan for co-counsel call
6/16/2017	Seth Packrone	0:06:00	Billable	Update intake letter with information for class action
6/16/2017	Seth Packrone	0:06:00	Billable	Review opposing counsel letter re: position on site visits
6/16/2017	Seth Packrone	0:12:00	Billable	Follow up with L. Ackerson re: next steps for records requests
6/16/2017	Seth Packrone	0:24:00	Billable	Co-counsel call with team re: next steps for discovery, expert and intakes
6/16/2017	Seth Packrone	0:12:00	Billable	Follow up tc with M. Smith re: next steps for case and staffing moving forward
6/16/2017	Seth Packrone	0:06:00	Billable	Correspond with G. Bueno re: modifying list of people who have access to client names
6/19/2017	Mary-Lee Smith	0:12:00	Billable	Email exchange w/ SP re client update and visits
6/19/2017	Seth Packrone	0:30:00	Billable	Tc with org. client re: update on case
6/19/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: email for expert
6/19/2017	Seth Packrone	0:06:00	Billable	Follow up on Defendants' position on timeline for expert's work
6/19/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: status of ADA coordinator position at NJDOC

6/19/2017	Seth Packrone	0:06:00	Billable	Follow up with R. Livengood re: response to opposing counsel/expert re: timeline for expert's work
6/19/2017	Seth Packrone	0:06:00	Billable	Check in with L. Ackerson re: status of records requests for potential client
6/19/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: client visits
6/19/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: following up with expert
6/19/2017	Seth Packrone	0:06:00	Billable	Get directions from M. Smith re: follow up with expert
6/20/2017	Seth Packrone	0:06:00	Billable	correspond with M. Smith re: visits to prisons
6/20/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: contacting ACLU about prison visits
6/20/2017	Seth Packrone	0:06:00	Billable	Review correspondence with opposing counsel re: site visits
6/20/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: client visits
6/20/2017	Seth Packrone	0:06:00	Billable	Check in with L. Ackerson re: next steps for records requests
6/21/2017	Mary-Lee Smith	0:18:00	Billable	Email exchange w/ SP and team re timing of expert site visits (multiple emails)
6/21/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: expert's position on timing of expert visits
6/21/2017	Seth Packrone	0:06:00	Billable	Corrspond with team re: expert's proposal for timeline for expert visits
6/21/2017	Seth Packrone	0:12:00	Billable	Review D's docs on 12 month school year and other educational requirements
6/21/2017	Seth Packrone	0:12:00	Billable	Follow up with M. Smith re: discovery next steps
6/21/2017	Seth Packrone	0:06:00	Billable	Follow up with L. Ackerson re: potential client's records from public school
6/21/2017	Seth Packrone	0:12:00	Billable	Review records requests letters and give final approval
6/21/2017	Seth Packrone	0:06:00	Billable	Review potential client's documents from public school
6/22/2017	Mary-Lee Smith	0:12:00	Billable	Discuss discovery approach and categories w/ SP
6/22/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: discovery plan and next steps for next meeting
6/22/2017	Seth Packrone	0:12:00	Billable	Tc with M. Smith re: next steps for prepping for discovery
6/22/2017	Seth Packrone	0:06:00	Billable	Draft agenda for co-counsel call
6/22/2017	Seth Packrone	0:06:00	Billable	Send draft agenda to M. Smith with question re: client follow up
6/22/2017	Seth Packrone	0:06:00	Billable	Correspond with opposing counsel re: client issue
6/22/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: client issue
6/23/2017	Mary-Lee Smith	0:12:00	Billable	Update from SP re team call and clients status
6/23/2017	Seth Packrone	0:06:00	Billable	Update team re: next meeting and send agenda
6/23/2017	Seth Packrone	0:24:00	Billable	Tc with R. Livengood re: next steps in case and updates for clients
6/23/2017	Seth Packrone	0:12:00	Billable	Update M. Smith re: team call and next steps for case
6/23/2017	Seth Packrone	0:06:00	Billable	Contact B. Friedman re: plan for discovery
6/26/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: next steps for discovery (drafting tags, key words, schedule for reviewing documents)
6/27/2017	Mary-Lee Smith	0:18:00	Billable	Review/revise letter to the court re site visit schedule
6/27/2017	Seth Packrone	0:06:00	Billable	Follow up on correspondence with opposing counsel and expert re: visit schedule for expert
6/27/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: items to include in letter to court re: site visit schedule
6/27/2017	Seth Packrone	0:18:00	Billable	Draft letter to court re: status of site visit schedule for expert
6/27/2017	Seth Packrone	0:12:00	Billable	Revise/edit letter to court re: status of site visit schedule
6/27/2017	Seth Packrone	0:06:00	Billable	Send draft letter to court to team with notes for editing
6/27/2017	Seth Packrone	0:12:00	Billable	Revise letter and proofread based on M. Smith and R. Livengood's edit s and send to team
6/27/2017	Seth Packrone	0:06:00	Billable	Follow up with R. Livengood re: visit with client and visiting DOC facility moving forward

6/27/2017	Seth Packrone	0:12:00	Billable	Prep to revise discovery categories/tags
6/28/2017	Mary-Lee Smith	0:24:00	Billable	Review/revise tags and categories for coding docs received from Ds; send edits to SP w/ email exchange re same w/ same
6/28/2017	Seth Packrone	1:00:00	Billable	Draft discovery categories/key words for reviewing DOC documents based on expert's discovery requests
6/28/2017	Seth Packrone	0:12:00	Billable	Revise discovery tags/categories to send to M. Smith
6/28/2017	Seth Packrone	0:12:00	Billable	Send discovery tags/categories to M. Smith with notes for further edits
6/29/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: edits to categories/tags fo discovery
6/29/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: discovery categories/tags and tomorrow's meeting
6/30/2017	Seth Packrone	0:12:00	Billable	Update team re: status of team calls and items to follow up on
6/30/2017	Seth Packrone	0:42:00	Billable	Revise discovery tags/categories based on M. Smith's edits/comments
6/30/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: discovery tags/categories and sending to team
6/30/2017	Seth Packrone	0:06:00	Billable	Send discovery tags/categories to team with note for next steps
6/30/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: next week's call with court and correspond with team re: same
7/4/2017	Mary-Lee Smith	0:12:00	Billable	Email exchange w/ S.Packrone re discovery extension
7/4/2017	Seth Packrone	0:18:00	Billable	Correspond with M. Smith and litigation team re: next steps for request for discovery extension
7/5/2017	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: granting defendants' discovery extension
7/6/2017	Mary-Lee Smith	0:18:00	Billable	Review/revise talking points for call with court from S.Packrone; add and edit
7/6/2017	Seth Packrone	0:06:00	Billable	Follow up with expert re: call with court
7/6/2017	Seth Packrone	0:24:00	Billable	Draft talking points re: 7.7.17 call with court
7/6/2017	Seth Packrone	0:06:00	Billable	Draft email to team re: call with court on 7.7
7/6/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: call with court and talking points
7/6/2017	Seth Packrone	0:12:00	Billable	Review/edit talking points for call with court and review court documents to confirm dates
7/6/2017	Seth Packrone	0:06:00	Billable	Review Defendants' letter to court re: follow up on site visits issue
7/6/2017	Seth Packrone	0:06:00	Billable	Send talking points to team and update on call with court
7/6/2017	Seth Packrone	0:06:00	Billable	Follow up with J. LoCicero re: talking points for call with court
7/7/2017	Mary-Lee Smith	0:12:00	Billable	Call with S.Packrone re court call and retainer with expert
7/7/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: today's call with court
7/7/2017	Seth Packrone	0:12:00	Billable	Follow up with team re: responding to Defendants' site visit proposals
7/7/2017	Seth Packrone	0:24:00	Billable	Prep for tc with court re: review letters to court
7/7/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: expert retainer
7/7/2017	Seth Packrone	0:06:00	Billable	Review correspondence from expert re: status of discovery materials
7/7/2017	Seth Packrone	0:18:00	Billable	Tc with Judge Goodman, J. LoCicero, and B. Friedman and opposing counsel and expert
7/7/2017	Seth Packrone	0:12:00	Billable	Follow up tc with J. LoCicero and B. Friedman re: next steps for case
7/7/2017	Seth Packrone	0:12:00	Billable	Update M. Smith re: call with court
7/7/2017	Seth Packrone	0:06:00	Billable	Check in with Laurel re: calendaring and status of potential client's records
7/9/2017	Mary-Lee Smith	0:12:00	Billable	Discuss site visits and discovery w/ SP
7/9/2017	Seth Packrone	0:06:00	Billable	Review emails with opposing counsel and expert
7/9/2017	Seth Packrone	0:12:00	Billable	Check in with M. Smith re: next steps in site visit schedule and discovery
7/10/2017	Mary-Lee Smith	0:18:00	Billable	Multiple calls and emails throughout day with SP re setting site visits, discovery and expert
7/10/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: plan for expert's visits

7/10/2017	Seth Packrone	0:06:00	Billable	Tc with client
7/10/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: site visits
7/10/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: plan for site visits
7/10/2017	Seth Packrone	0:06:00	Billable	Review correspondence from Defendants
7/10/2017	Seth Packrone	0:06:00	Billable	Tc with M. Smith re: plan for site visits
7/10/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: next steps
7/10/2017	Seth Packrone	0:12:00	Billable	Draft response to G. Bueno re: site visits for experts
7/10/2017	Seth Packrone	0:06:00	Billable	Send Defendants and expert update on site visit plan and plaintiffs' proposal
7/10/2017	Seth Packrone	0:06:00	Billable	Follow up with Defendants re: adding new person to list of employees
7/10/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: potential client's educational records
7/11/2017	Seth Packrone	0:06:00	Billable	Follow up with L. Ackerman re: analyzing records
7/11/2017	Seth Packrone	0:06:00	Billable	Review Defendants' email
7/11/2017	Seth Packrone	0:30:00	Billable	Draft proposal for site visits and edit potential consent order
7/11/2017	Seth Packrone	0:06:00	Billable	Correspond with J. LoCicero re: discovery files
7/11/2017	Seth Packrone	0:12:00	Billable	Draft follow up email to G. Bueno re: consent order
7/11/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: next steps for potential consent order on site visits and the expert timeline
7/12/2017	Mary-Lee Smith	0:18:00	Billable	Review/revise tags and categories for coding docs received from Ds
7/12/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: status of consent order
7/12/2017	Seth Packrone	0:06:00	Billable	Correspond with B. Friedman and R. Livengood re: status of site visits and cosent order
7/12/2017	Seth Packrone	0:12:00	Billable	Edit consent order
7/12/2017	Seth Packrone	0:06:00	Billable	Send proposed consent order to G. Bueno
7/12/2017	Seth Packrone	0:06:00	Billable	Give instructions to L. Ackerson re: reviewing documents
7/12/2017	Seth Packrone	0:12:00	Billable	Correspond with G. Bueno re: timing for site visits
7/12/2017	Seth Packrone	0:06:00	Billable	Review R. Livengood edits to tags/categories for discovery
7/12/2017	Seth Packrone	0:06:00	Billable	Update M. Smith re: edits to tags/categories
7/12/2017	Seth Packrone	0:12:00	Billable	Sort discovery documents from Defendants
7/12/2017	Seth Packrone	0:06:00	Billable	Tc with R. Livengood re: discovery call and co-counsel capacity for reviewing documents
7/12/2017	Seth Packrone	0:06:00	Billable	Update M. Smith re: plan for discovery call
7/12/2017	Seth Packrone	0:06:00	Billable	Tc with M. Smith, B. Silverman, and B. Friedman re: plan for discovery
7/12/2017	Seth Packrone	0:06:00	Billable	Send update on potential client and documents to team
7/12/2017	Seth Packrone	0:06:00	Billable	Edit discovery tags/categories based on co-counsel's edits
7/12/2017	Seth Packrone	0:06:00	Billable	Send update to team re: discovery tags/categories
7/12/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: tasks over the next week
7/12/2017	Seth Packrone	0:06:00	Billable	Tc with R. Livengood re: update from discovery call with co-counsel
7/13/2017	Seth Packrone	0:06:00	Billable	Tc with R. Livengood re: filing consent order
7/13/2017	Seth Packrone	0:06:00	Billable	Update M. Smith re: status of consent order
7/21/2017	Seth Packrone	0:12:00	Billable	Review emails with team and opposing counsel re: schedule for expert visits
7/22/2017	Seth Packrone	0:06:00	Billable	Correspond with L. Ackerson re: filings in NJDOC
7/24/2017	Seth Packrone	0:12:00	Billable	Review emails with opposing counsel and co-counsel

7/25/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: visit schedule for expert
7/26/2017	Seth Packrone	0:06:00	Billable	Check in with M. Smith re: status of case
7/27/2017	Seth Packrone	0:06:00	Billable	Review emails re: expert discovery
7/27/2017	Seth Packrone	0:06:00	Billable	Review timeline for expert visits
7/27/2017	Seth Packrone	0:06:00	Billable	Check in with M. Smith and team re: meeting
7/27/2017	Seth Packrone	0:06:00	Billable	Tc with R. Livengood re: order to file with court
7/27/2017	Seth Packrone	0:06:00	Billable	Send order to M. Smith and R. Livengood to file with court
7/27/2017	Seth Packrone	0:06:00	Billable	Draft agenda for tomorrow' meetings
7/27/2017	Seth Packrone	0:18:00	Billable	Review letters filed with court while away
7/28/2017	Mary-Lee Smith	0:18:00	Billable	Discuss call re doc review and site visits w/ SP
7/28/2017	Seth Packrone	0:18:00	Billable	Tc with R. Livengood and B. Friedman re: discovery review and site visit strategy
7/28/2017	Seth Packrone	0:18:00	Billable	Correspond with M. Smith re: update on call and next steps for site visits
7/29/2017	Seth Packrone	0:12:00	Billable	Check in with M. Smith re: site visits to prisons
7/31/2017	Seth Packrone	0:06:00	Billable	Follow up on filed order with L. Ackerson and review court filings
7/31/2017	Seth Packrone	0:12:00	Billable	Draft timeline for site visits and apportion visits
7/31/2017	Seth Packrone	0:06:00	Billable	Send timeline for site visits with questions to M. Smith
7/31/2017	Seth Packrone	0:06:00	Billable	Draft email to send to team with timeline for site visits
7/31/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: staffing for site visits
8/2/2017	Mary-Lee Smith	0:12:00	Billable	Call with co-counsel re next steps in expert doc production and setting up visits
8/2/2017	Mary-Lee Smith	0:06:00	Billable	Email to G. Bueno re doc production
8/2/2017	Seth Packrone	0:12:00	Billable	Draft update/agenda for M. Smith for today's call
8/2/2017	Seth Packrone	0:06:00	Billable	Review discovery docs from Defendants
8/2/2017	Seth Packrone	0:06:00	Billable	Update team re: agenda for call and site visits
8/2/2017	Seth Packrone	0:12:00	Billable	Tc with co-counsel re: plan for discovery and site visits
8/2/2017	Seth Packrone	0:06:00	Billable	Draft email to Defendants re: discovery
8/3/2017	Seth Packrone	0:12:00	Billable	Follow up with M. Smith re: regulations and potential client records
8/3/2017	Seth Packrone	0:06:00	Billable	Correspond with L. Ackerson re: status of records requests and filings on ECF
8/10/2017	Mary-Lee Smith	0:12:00	Billable	Review agenda for team meeting tomorrow; email S.Packrone re same
8/10/2017	Seth Packrone	0:06:00	Billable	Draft agenda for tomorrow's call
8/10/2017	Seth Packrone	0:12:00	Billable	Send agenda to M. Smith with notes for document review
8/10/2017	Seth Packrone	0:12:00	Billable	Send agenda to team with notes for today's call
8/11/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: agenda items for today's call
8/11/2017	Seth Packrone	0:12:00	Billable	Follow up with M. Smith re: today's call and discovery and site visits
8/11/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: schedule for site visits
8/11/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: site visits
8/11/2017	Seth Packrone	0:06:00	Billable	Check document uploads and whether guide works for reviewing documents
8/13/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: discovery proposal
8/13/2017	Seth Packrone	0:06:00	Billable	Send proposal for discovery timeline/breakdown to team
8/14/2017	Seth Packrone	0:12:00	Billable	Tc with client

8/14/2017	Seth Packrone	0:12:00	Billable	Follow up with team re: status of diploma for client
8/14/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: diploma strategy
8/14/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: diploma strategy
8/14/2017	Seth Packrone	0:06:00	Billable	Tc with client re: update on case
8/16/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: plan for next meeting
8/17/2017	Seth Packrone	0:30:00	Billable	Tc with team re: next steps for site visits and discovery process
8/19/2017	Seth Packrone	0:18:00	Billable	Correspond with team re: next steps for compelling Defendants to turn over documents
8/21/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: next steps in getting judge to compel Defendants to turn over documents
8/21/2017	Seth Packrone	0:24:00	Billable	Review regulations for HIPAA compliant protective order and turning over information
8/21/2017	Seth Packrone	0:06:00	Billable	Tc with R. Livengood re: attorney client visit lists
8/21/2017	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: regulations for HIPAA compliant protective order
8/21/2017	Seth Packrone	0:06:00	Billable	Tc with R. Livengood re: plan for site visits at NJDOC facility
8/21/2017	Seth Packrone	0:36:00	Billable	Draft order to compel Defendants to turn over information
8/21/2017	Seth Packrone	0:12:00	Billable	Revise order before sending to co-counsel
8/21/2017	Seth Packrone	0:18:00	Billable	Complete documents for site visit background checks
8/21/2017	Seth Packrone	0:06:00	Billable	Correspond with G. Bueno re: completing background check forms
8/21/2017	Seth Packrone	0:06:00	Billable	Tc with M. Smith re: plan for call with court
8/21/2017	Seth Packrone	0:24:00	Billable	Tc with Judge Goodman, co-counsel, and opposing counsel re: documents to turn over to expert and plaintiffs' counsel
8/21/2017	Seth Packrone	0:06:00	Billable	Tc with R. Livengood re: next steps for court order
8/21/2017	Seth Packrone	0:12:00	Billable	Follow up on emails with opposing counsel re: plans for site visits
8/21/2017	Seth Packrone	0:12:00	Billable	Correspond with co-counsel re: information to turn over to DOC
8/22/2017	Seth Packrone	0:12:00	Billable	Get input from M. Caiola re: providing info to DOC
8/22/2017	Seth Packrone	0:06:00	Billable	Follow up with RL re: information to provide to DOC
8/22/2017	Seth Packrone	0:30:00	Billable	Follow up on documents needed for site visit and submit to Defendants
8/22/2017	Seth Packrone	0:12:00	Billable	Edit court order
8/22/2017	Seth Packrone	0:06:00	Billable	Tc with RL and JL from co-counsel re: information to submit to Defendants and court order
8/22/2017	Seth Packrone	0:12:00	Billable	Tc with RL from co-counsel re: prep for site visit tomorrow
8/22/2017	Seth Packrone	0:12:00	Billable	Prep for site visit at Mountainview
8/23/2017	Seth Packrone	0:48:00	Billable	Travel to and from Mountainview Youth Correctional Facility for site visit (1.7 total - bill half)
8/23/2017	Seth Packrone	0:30:00	Billable	pre-meeting and processing with DOC staff and expert
8/23/2017	Seth Packrone	2:48:00	Billable	Tour and observing classes with expert during site visit at MV
8/23/2017	Seth Packrone	2:00:00	Billable	Wait with DOC staff while expert views IEPs and reviews other documents during site visit of MV
8/23/2017	Seth Packrone	0:24:00	Billable	Reconvene with expert during MV site visit to go over outstanding documents and other questions
8/23/2017	Seth Packrone	0:48:00	Billable	Wait with DOC staff while expert interviews students for MV site visit
8/23/2017	Seth Packrone	0:30:00	Billable	Recap with expert after interviews with students during MV site visit
8/23/2017	Seth Packrone	1:24:00	Billable	Wait with DOC staff while expert continued to review documents during MV site visit
8/23/2017	Seth Packrone	0:30:00	Billable	Recap site visit summary with expert after he completed his review at MV
8/23/2017	Seth Packrone	0:18:00	Billable	Confer with R. Livengood re: impressions and next steps
8/23/2017	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: intakes for Monday

8/24/2017	Mary-Lee Smith	0:48:00	Billable	Call w/ co-counsel rer visits and doc review
8/24/2017	Mary-Lee Smith	0:12:00	Billable	Check in with S.Packrone following call w/ co-counsel re site visits and expert report
8/24/2017	Seth Packrone	0:18:00	Billable	Compile intake list and research further intakes for RL
8/24/2017	Seth Packrone	0:06:00	Billable	Send next round of intakes to RL for visits with notes on next steps
8/24/2017	Seth Packrone	0:06:00	Billable	Follow up with client re: update on case
8/24/2017	Seth Packrone	0:06:00	Billable	Draft agenda for team call and send to M. Smith
8/24/2017	Seth Packrone	0:06:00	Billable	Draft short memo re: update on site visit for M. Smith
8/24/2017	Seth Packrone	0:06:00	Billable	Update M. Caiola re: site visit status
8/24/2017	Seth Packrone	0:06:00	Billable	Tc with R. Livengood re: issues for today's call from site visit
8/24/2017	Seth Packrone	0:06:00	Billable	Update agenda for today's call
8/24/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: strategic items for today's call
8/24/2017	Seth Packrone	0:12:00	Billable	Review memo on site visit from R. Livengood
8/24/2017	Seth Packrone	0:48:00	Billable	Tc with M. Smith, B. Friedman, and E. Huertas re: next site visits and strategic decisions
8/24/2017	Seth Packrone	0:06:00	Billable	Follow up tc with M. Smith re: retainer
8/24/2017	Seth Packrone	0:18:00	Billable	Modify retainer for potential client
8/24/2017	Seth Packrone	0:06:00	Billable	Review emails with opposing counsel and expert
8/24/2017	Seth Packrone	0:12:00	Billable	Correspond with team re: retainer and following up with G. Bueno
8/24/2017	Seth Packrone	0:06:00	Billable	Update site visit schedule and circulate for further input from team
8/25/2017	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: status of retainer
8/25/2017	Seth Packrone	0:06:00	Billable	Correspond with opposing counsel re: schedule for site visits
8/28/2017	Mary-Lee Smith	0:12:00	Billable	Email exchange w/ S.Packrone re site visits and retainers for potentially new clients
8/28/2017	Seth Packrone	0:48:00	Billable	Tc with J. Oppenheim re: update on case
8/28/2017	Seth Packrone	0:24:00	Billable	Review discovery documents from Defendants for expert
8/28/2017	Seth Packrone	0:06:00	Billable	Tc with R. Livengood re: plan for today's visits
8/28/2017	Seth Packrone	0:06:00	Billable	Tc with B. Friedman re: next steps for discovery
8/28/2017	Seth Packrone	0:06:00	Billable	Review correspondence between expert and opposing counsel
8/28/2017	Seth Packrone	0:12:00	Billable	Update site visit list and follow up with team re: same
8/28/2017	Seth Packrone	0:06:00	Billable	Update team re: status of document review for discovery
8/28/2017	Seth Packrone	0:06:00	Billable	Review investigation retainer drafted by R. Livengood
8/28/2017	Seth Packrone	0:12:00	Billable	Update M. Smith re: issues in case and investigation retainer
8/29/2017	Seth Packrone	0:12:00	Billable	Follow up with org. client re: judge goodman order and progress on case
8/29/2017	Seth Packrone	0:06:00	Billable	Follow up re: expert payment
8/29/2017	Seth Packrone	0:18:00	Billable	Review discovery documents from Defendants for expert and index
8/29/2017	Seth Packrone	0:18:00	Billable	Draft plan for team re: following up with DOC and expert about missing documents
8/29/2017	Seth Packrone	0:12:00	Billable	Review NJSP documents turned over by Defendants
8/29/2017	Seth Packrone	0:06:00	Billable	Correspond with E. Huertas re: release language
8/29/2017	Seth Packrone	0:12:00	Billable	Correspond with team re: intakes and next steps
8/29/2017	Seth Packrone	0:06:00	Billable	Review intake notes from RL's visits
8/29/2017	Seth Packrone	0:06:00	Billable	Draft response to Defendants re: expert's renewed discovery requests

8/29/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: this week's meeting and response to Defendants
8/29/2017	Seth Packrone	0:06:00	Billable	Correspond with co-counsel re: next steps for meeting, intakes, and discovery review
8/29/2017	Seth Packrone	0:06:00	Billable	Follow up with R. Livengood re: whether expert got all documents he needs
8/29/2017	Seth Packrone	0:18:00	Billable	Review documents from NJDOC for expert and follow up with B. Friedman re: same
8/29/2017	Seth Packrone	0:06:00	Billable	Update agenda for weekly call with next step questions for clients/intakes
8/29/2017	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: follow up with defendants and expert about outstanding document requests
8/29/2017	Seth Packrone	0:06:00	Billable	Send email to everyone re: outstanding documents that NJDOC owes expert
8/29/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith
8/30/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: agenda for tomorrow's call and next steps for site visits
8/30/2017	Seth Packrone	0:06:00	Billable	Review correspondence from expert and opposing counsel re: site visits and follow up documents needed
8/30/2017	Seth Packrone	0:12:00	Billable	Review/analyze/draft response to expert's questions re: expert report format and schedules for site visits
8/30/2017	Seth Packrone	0:06:00	Billable	Follow up with opposing counsel re: status of expert's new document requests
8/30/2017	Seth Packrone	0:12:00	Billable	Correspond with R. Livengood and B. Friedman re: attendance at site visits next week
8/30/2017	Seth Packrone	0:18:00	Billable	Correspond with M. Smith re: discovery plan for expert discovery and next steps for case
8/30/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: discovery plan
8/30/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: agenda for tomorrow's call
8/30/2017	Seth Packrone	0:06:00	Billable	Follow up with team and M. Smith re: response to expert for formatting report
8/30/2017	Seth Packrone	0:06:00	Billable	Correspond with expert re: formatting of report and follow up discovery requests for Mountainview
8/30/2017	Seth Packrone	0:18:00	Billable	Review documents turned over by Defendants to expert
8/31/2017	Seth Packrone	0:42:00	Billable	Tc with co-counsel re: review of documents turned over by Defendants for expert
8/31/2017	Seth Packrone	0:06:00	Billable	Tc with R. Livengood re: update on client visits
8/31/2017	Seth Packrone	0:18:00	Billable	Update M. Smith re: discovery call and client visits
8/31/2017	Seth Packrone	0:36:00	Billable	Tc with R. Livengood, M. Smith, B. Friedman, and E. Huertas re: next steps for site visits and discovery
8/31/2017	Seth Packrone	0:18:00	Billable	Draft response to Defendants questions and update on attendance at site visits
9/1/2017	Seth Packrone	0:06:00	Billable	Review expert email and proposed schedule for site visit to NJSP/M'View/CRAF
9/1/2017	Seth Packrone	0:06:00	Billable	Correspond with B. Friedman re: changes to visit schedule
9/1/2017	Seth Packrone	0:06:00	Billable	Update site visit schedule and plan for next week to send to Defendants
9/1/2017	Seth Packrone	0:06:00	Billable	Tc with opposing counsel Vomacka re: plan for site visit on Tuesday
9/1/2017	Seth Packrone	0:06:00	Billable	Tc with R. Livengood re: plaintiffs' position on expert's extra site visit
9/1/2017	Seth Packrone	0:06:00	Billable	Update M. Smith re: site visit schedule
9/1/2017	Seth Packrone	0:06:00	Billable	Correspond with R. Livengood re: interviewing named plaintiffs
9/1/2017	Seth Packrone	0:06:00	Billable	Follow up with R. Livengood and M. Smith re: response to Defendants
9/1/2017	Seth Packrone	0:06:00	Billable	Update Defendants and expert re: plan for next week and plaintiffs' position on site visits
9/1/2017	Seth Packrone	0:24:00	Billable	Prep for site visit at NJSP on 9/5/17
9/5/2017	Seth Packrone	0:36:00	Billable	Travel to New Jersey State Prison for expert site visit (bill half, exclude half)
9/5/2017	Seth Packrone	0:24:00	Billable	Wait for opposing counsel to arrive in conference room with expert and client at site visit
9/5/2017	Seth Packrone	2:06:00	Billable	Pre-meeting and tour of facility with expert at site visit
9/5/2017	Seth Packrone	3:00:00	Billable	Conference room session with opposing counsel and expert as expert goes over documents needed for his expert report that Defendants have not provided yet at site visit
9/5/2017	Seth Packrone	0:30:00	Billable	Tour of facility with expert to observe educational instruction at site visit

9/5/2017	Seth Packrone	1:12:00	Billable	Debrief in conference room with expert and continue to go over document requests at site visit
9/5/2017	Seth Packrone	1:30:00	Billable	Wait in conference room with opposing counsel as expert reviewed documents in a different room at site visit
9/5/2017	Seth Packrone	0:36:00	Billable	Travel from New Jersey State Prison for expert site visit (bill half, exclude half)
9/5/2017	Seth Packrone	0:06:00	Billable	Correspond with co-counsel re: Wednesday's site visit
9/6/2017	Mary-Lee Smith	0:18:00	Billable	Email S.Packrone re site visits updates
9/6/2017	Seth Packrone	0:36:00	Billable	Travel to DOC facility for expert site visit (bill half, exclude half)
9/6/2017	Seth Packrone	0:36:00	Billable	Wait in conference room with expert and opposing counsel at site visit
9/6/2017	Seth Packrone	0:18:00	Billable	Wait for processing to begin our tour with expert (but processing took long, so tour didn't happen) at site visit
9/6/2017	Seth Packrone	0:18:00	Billable	Wait for client. to be brought to attorney visit room
9/6/2017	Seth Packrone	0:36:00	Billable	Meeting with client
9/6/2017	Seth Packrone	0:24:00	Billable	Wait in conference room for expert at site visit
9/6/2017	Seth Packrone	0:12:00	Billable	Answer question from expert re: documents for named plaintiffs at site visit
9/6/2017	Seth Packrone	0:30:00	Billable	Confer with opposing counsel re: getting expert documents he needs for named plaintiffs at site visit
9/6/2017	Seth Packrone	0:54:00	Billable	Tour with expert to see student he did not see on the day before at site visit
9/6/2017	Seth Packrone	0:36:00	Billable	Confer with Defendants re: providing documents on named plaintiffs to Gagnon at site visit
9/6/2017	Seth Packrone	0:06:00	Billable	Tc with M. Smith re: providing documents pertaining to named plaintiffs' education
9/6/2017	Seth Packrone	0:18:00	Billable	Wait for expert while he interviews students at site visit
9/6/2017	Seth Packrone	1:12:00	Billable	Review documents on named plaintiffs from Defendants and to give to expert at site visit
9/6/2017	Seth Packrone	1:00:00	Billable	Wait while expert reviews educational documents from facility at site visit
9/6/2017	Seth Packrone	1:18:00	Billable	Answer question from expert re: documents for named plaintiffs at site visit
9/6/2017	Seth Packrone	0:06:00	Billable	Wait for expert to finish preparing summary of day at site visit
9/6/2017	Seth Packrone	0:36:00	Billable	Summary from expert re: special education at DOC facility
9/6/2017	Seth Packrone	0:42:00	Billable	Travel back from DOC facility for expert site visit (bill half, exclude half)
9/6/2017	Seth Packrone	0:06:00	Billable	Update team re: short summary of DOC facility visit
9/7/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: next steps for site visits
9/7/2017	Seth Packrone	0:06:00	Billable	Correspond with B. Friedman re: CRAF site visit
9/8/2017	Seth Packrone	0:12:00	Billable	Correspond with team re: plan for site visits
9/8/2017	Seth Packrone	0:06:00	Billable	Correspond with Defendants re: attorney attendance at site visits moving forward
9/8/2017	Seth Packrone	0:06:00	Billable	Update team re: short summary of CRAF visit
9/8/2017	Seth Packrone	0:42:00	Billable	Travel to CRAF re: expert site visit (bill for half, exclude half)
9/8/2017	Seth Packrone	2:00:00	Billable	Conference room session with Defendants and expert re: documents needed to evaluate CRAF's need for education at site visit
9/8/2017	Seth Packrone	1:12:00	Billable	Wait for documents to be delivered to expert for him to evaluate need for education at CRAF at site visit
9/8/2017	Seth Packrone	1:00:00	Billable	Work session with Defendants and expert re: documents needed to evaluate need for transition services and other issues from previous visits at site visit
9/8/2017	Seth Packrone	0:36:00	Billable	Review documents about potential class member to determine if education is needed at site visit
9/8/2017	Seth Packrone	1:06:00	Billable	Wait for CRAF intake documents from Defendants at site visit at site visit
9/8/2017	Seth Packrone	0:42:00	Billable	Review and discuss intake documents with defendnatns and experts at CRAF site visit
9/8/2017	Seth Packrone	0:18:00	Billable	Summary of CRAF visit from expert at site visit
9/8/2017	Seth Packrone	0:42:00	Billable	Travel from CRAF re: expert site visit (bill for half, exclude half)
9/8/2017	Seth Packrone	0:42:00	Billable	Travel from CRAF re: expert site visit (bill for half, exclude half)

9/8/2017	Seth Packrone	0:12:00	Billable	Tc with J. LoCicero re: attending site visits at Garden State and Wagner
9/8/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: update on CRAF visit and plan for next site visits
9/11/2017	Michelle Caiola	0:12:00	Billable	update re prison visits with expert, planning for next steps
9/11/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: status of visits later in the week
9/11/2017	Seth Packrone	0:12:00	Billable	Update M. Caiola re: status of expert site visits and steps for next visits
9/11/2017	Seth Packrone	0:06:00	Billable	Review potential client's documents
9/11/2017	Seth Packrone	0:06:00	Billable	Send potential client's documents to E. Huertas and check about status of RL's visit
9/11/2017	Seth Packrone	0:06:00	Billable	Tc with E. Huertas re: update on releases
9/11/2017	Seth Packrone	0:06:00	Billable	Correspond with J. LoCicero re: her attendance at site visits
9/12/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: letter to Judge Goodman re: defendants' failure to provide documents
9/12/2017	Seth Packrone	0:06:00	Billable	Tc with B. Friedman re: update on site visit attendance
9/12/2017	Seth Packrone	0:24:00	Billable	Tc with J. LoCicero re: update on Garden State visit and letter to judge
9/12/2017	Seth Packrone	0:18:00	Billable	Draft short memo re: update on site visits and next steps for M. Smith
9/12/2017	Seth Packrone	0:06:00	Billable	Review emails from expert re: additional document requests
9/12/2017	Seth Packrone	0:18:00	Billable	Draft email to Defendants re: document production for named plaintiffs
9/13/2017	Seth Packrone	0:18:00	Billable	Review/edit letter to judge goodman and correspond with team re: same
9/13/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: follow up email about document production for named plaintiffs
9/13/2017	Seth Packrone	0:12:00	Billable	Edit/revise NJSP day 2 memo
9/13/2017	Seth Packrone	0:06:00	Billable	Send short summary to team re: GYCF visit and NJSP day #2
9/13/2017	Seth Packrone	0:06:00	Billable	Correspond with defendants re: plaintiffs turning over documents for named plaintiffs
9/13/2017	Seth Packrone	0:36:00	Billable	Drive to DOC facility for expert site visit (bill half, exclude half)
9/13/2017	Seth Packrone	0:36:00	Billable	Drive from DOC facility for expert site visit (bill half, exclude half)
9/13/2017	Seth Packrone	0:06:00	Billable	Getting processed at DOC facility for site visit
9/13/2017	Seth Packrone	0:48:00	Billable	Wait in conference room for others to arrive at site visit
9/13/2017	Seth Packrone	1:12:00	Billable	Work through documents that were produced/still need to be produced with expert at site visit
9/13/2017	Seth Packrone	0:12:00	Billable	Wait for G. Bueno at site visit in board room
9/13/2017	Seth Packrone	0:06:00	Billable	Discuss grievances for named plaintiffs at site visit
9/13/2017	Seth Packrone	1:30:00	Billable	Write memo re: NJSP day #2 expert site visit
9/13/2017	Seth Packrone	0:36:00	Billable	Wait to be moved to another room during DOC facility site visit (moving from board room into room in secured facility)
9/13/2017	Seth Packrone	0:30:00	Billable	Write memo re: CRAF site visit
9/13/2017	Seth Packrone	0:48:00	Billable	Expert returns to board room in secure facility after interviews and discuss several requests/questions he has
9/13/2017	Seth Packrone	1:12:00	Billable	Wait in secure facility with opposing counsel while expert reviewed documents and prepared summary at site visit (and answered questions with opposing counsel as they arose)
9/13/2017	Seth Packrone	0:30:00	Billable	Get summary from expert at site visit and ask questions re: same with opposing counsel
9/13/2017	Seth Packrone	0:12:00	Billable	Get processed back out of secure facility into board room area at site visit
9/13/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: update on site visit
9/14/2017	Seth Packrone	0:36:00	Billable	Drive to Wagner Youth Correctional Facility for Gagnon site visit (bill half, exclude half)
9/14/2017	Seth Packrone	0:36:00	Billable	Drive from Wagner Youth Correctional Facility for Gagnon site visit (bill half, exclude half)
9/14/2017	Seth Packrone	1:18:00	Billable	Conference with parties and expert re: plan for the day at site visit
9/14/2017	Seth Packrone	0:42:00	Billable	Tour of facility with parties and expert at site visit

9/14/2017	Seth Packrone	0:54:00	Billable	Conference with expert and opposing counsel at site visit at Wagner
9/14/2017	Seth Packrone	1:36:00	Billable	Wait in conference room at site visit while expert works
9/14/2017	Seth Packrone	0:36:00	Billable	Conference with opposing party and expert in conference room
9/14/2017	Seth Packrone	0:06:00	Billable	Tc with J. LoCicero re: plan for tomorrow's site visit and Defendants' position on further site visits
9/14/2017	Seth Packrone	0:06:00	Billable	Discussion with M. Vomacka re: Defendants' position on extra site visits
9/14/2017	Seth Packrone	0:18:00	Billable	Step out of conference room with E. Huertas while Defendants have conference at site visit
9/14/2017	Seth Packrone	1:00:00	Billable	Conference with expert and opposing counsel at site visit at Wagner
9/14/2017	Seth Packrone	0:30:00	Billable	Wait in conference room with opposing counsel while expert works
9/14/2017	Seth Packrone	0:12:00	Billable	Correspond with M. Smith re: status of site visits and next steps
9/15/2017	Seth Packrone	0:36:00	Billable	Drive to Wagner Youth Correctional Facility for expert site visit (bill half, exclude half)
9/15/2017	Seth Packrone	0:36:00	Billable	Drive from Wagner Youth Correctional Facility for expert site visit (bill half, exclude half)
9/15/2017	Seth Packrone	0:12:00	Billable	Get processed at Ad seg unit at Wagner at site visit
9/15/2017	Seth Packrone	0:54:00	Billable	Tour of ad seg unit at Wagner with expert and opposing counsel at site visit
9/15/2017	Seth Packrone	0:12:00	Billable	Move to main at Wagner at site visit
9/15/2017	Seth Packrone	0:12:00	Billable	Tour of main at site visit at Wagner
9/15/2017	Seth Packrone	0:48:00	Billable	Wait with expert and opposing counsel while Gagnon worked at site visit
9/15/2017	Seth Packrone	1:00:00	Billable	Wait with opposing counsel outside conference room while expert interviewed teachers
9/15/2017	Seth Packrone	0:24:00	Billable	Observe interview of staff by expert
9/15/2017	Seth Packrone	0:18:00	Billable	Wait in conference room while expert interviews student in main
9/15/2017	Seth Packrone	0:12:00	Billable	Check in with expert with opposing counsel in conference in between interviews
9/15/2017	Seth Packrone	0:12:00	Billable	Discussion with M. Vomacka re: next steps in providing documents to expert for named plaintiffs
9/15/2017	Seth Packrone	0:30:00	Billable	Wait while expert interviews students at Ad Seg
9/15/2017	Seth Packrone	0:30:00	Billable	Answer questions with opposing counsel with expert when he returned and discuss timetable for rest of day
9/15/2017	Seth Packrone	0:06:00	Billable	Tc with E. Huertas re: status of Adam X. records
9/15/2017	Seth Packrone	0:12:00	Billable	Wait in conference room while expert works
9/15/2017	Seth Packrone	0:18:00	Billable	Wait while expert reviewed IEPs and prepared summary to present
9/15/2017	Seth Packrone	0:30:00	Billable	Get final summary from expert of Wagner day #2
9/18/2017	Mary-Lee Smith	0:30:00	Billable	Check in with SP re Adam X
9/18/2017	Seth Packrone	0:06:00	Billable	Update M. Caiola re: status of site visits
9/18/2017	Seth Packrone	0:06:00	Billable	Correspond with J. LoCicero re: follow up on site visits
9/18/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: update on site visits
9/18/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: agenda for call with team
9/18/2017	Seth Packrone	0:12:00	Billable	Finish memo re: CRAF site visit
9/18/2017	Seth Packrone	0:06:00	Billable	Begin drafting G. State memo for day 2 site visit
9/18/2017	Seth Packrone	0:30:00	Billable	Tc with M. Smith re: update on site visits and next steps for expert's report
9/18/2017	Seth Packrone	0:06:00	Billable	Edit CRAF site visit memo
9/18/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: meeting to discuss site visit and next steps for expert's report
9/19/2017	Michelle Caiola	0:12:00	Billable	follow up with SP re staffing, co-counsel, and posture of case
9/19/2017	Seth Packrone	1:12:00	Billable	Draft Garden State day 2 site visit memo

9/19/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: update call on site visits
9/19/2017	Seth Packrone	0:06:00	Billable	Draft agenda for team call to update everyone on site visit
9/19/2017	Seth Packrone	1:24:00	Billable	Draft memo re: Wagner site visit day 2
9/19/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: check in meeting
9/19/2017	Seth Packrone	0:54:00	Billable	Tc with team (T. Borden, J. LoCicero, W. Silverman, B. Friedman, and E. Huertas) re: status of case and next steps
9/19/2017	Seth Packrone	0:06:00	Billable	Follow up items from team call
9/19/2017	Seth Packrone	0:18:00	Billable	Review/edit site visit memos
9/19/2017	Seth Packrone	0:06:00	Billable	Send site visit memos to team with notes for next steps
9/20/2017	Mary-Lee Smith	0:12:00	Billable	Email exchange w/ SP re report format
9/20/2017	Seth Packrone	0:06:00	Billable	Correspond with T. Borden and J. LoCicero re: client meetings
9/20/2017	Seth Packrone	0:06:00	Billable	Correspond with org. client re: update call
9/20/2017	Seth Packrone	0:18:00	Billable	Draft response to expert re: format/deadline for report
9/20/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: follow up with expert
9/20/2017	Seth Packrone	0:06:00	Billable	Review docs for client sent by co-counsel
9/20/2017	Seth Packrone	0:06:00	Billable	Tc with E. Huertas re: client.'s documents
9/20/2017	Seth Packrone	0:06:00	Billable	Edit format/deadline email based on M. Smith's thoughts
9/20/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: email to expert for format/deadline for report
9/20/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: next steps in case
9/20/2017	Seth Packrone	0:24:00	Billable	Review docs for named plaintiffs to follow up with expert
9/20/2017	Seth Packrone	0:18:00	Billable	Draft follow up email re: named plaintiffs documents for expert and correspond with M. Smith re: same
9/21/2017	Seth Packrone	0:06:00	Billable	Follow up with J. LoCicero re: deadline/format for expert's report
9/21/2017	Seth Packrone	0:06:00	Billable	Send update on expert's format/due date for report
9/21/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: discovery follow up and deadline
9/22/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: turning over documents to expert
9/22/2017	Seth Packrone	0:06:00	Billable	Check in with J. Mukherjee re: potential document production
9/22/2017	Seth Packrone	0:12:00	Billable	Correspond with Defendants and expert re: documents for named plaintiffs
9/22/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: talking points for call on Monday
9/22/2017	Seth Packrone	0:12:00	Billable	Review J. LoCicero's letter and attachment
9/22/2017	Seth Packrone	0:06:00	Billable	Review Defendants' response to J. LoCicero's letter
9/22/2017	Seth Packrone	0:12:00	Billable	Draft talking point for Monday's call with court
9/22/2017	Seth Packrone	0:06:00	Billable	Correspond with J. LoCicero re: talking points for Monday's call
9/22/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: status of site visit memos
9/24/2017	Seth Packrone	0:12:00	Billable	Review/edit J. LoCicero's talking points for call with Judge Goodman
9/24/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: call with Judge Goodman
9/25/2017	Mary-Lee Smith	0:12:00	Billable	Check in w/ SP re Adam X call and any updates/decisions made
9/25/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: call with Judge Goodman today and talking points for call
9/25/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: format of expert's report
9/25/2017	Seth Packrone	0:12:00	Billable	Prep for call with court by reviewing talking points and expert's recent emails
9/25/2017	Seth Packrone	0:18:00	Billable	Tc with court, J. LoCicero, B. Friedman, opposing counsel, and expert

9/25/2017	Seth Packrone	0:06:00	Billable	Follow up tc with team re: next steps after call with court
9/25/2017	Seth Packrone	0:12:00	Billable	Update M. Smith re: summary of call with court and next steps in case
9/25/2017	Seth Packrone	0:06:00	Billable	Prep agenda for tc with org. client re: case status update
9/25/2017	Seth Packrone	0:42:00	Billable	Tc with org. client re: update on status of case and following up about specific individual
9/25/2017	Seth Packrone	0:06:00	Billable	Tc with T. Borden re: follow up steps from org. client call
9/25/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: update from call with org. client and next steps for individual in DOC custody
9/26/2017	Seth Packrone	0:06:00	Billable	Email Defendants re: meet and confer per Judge Goodman's instructions
9/26/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: conference with opposing counsel and expert
9/26/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: plan for next call with court
9/26/2017	Seth Packrone	0:06:00	Billable	Follow up with Defendants re: conferring on schedule for expert deadlines
9/26/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith and team re: weekly call
9/27/2017	Mary-Lee Smith	0:18:00	Billable	Check in with SP re call w/ Ds and Court; email exchange w/ team re same
9/27/2017	Seth Packrone	0:12:00	Billable	Draft proposal for call with opposing counsel and expert re: finishing expert report
9/27/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: edits to proposal
9/27/2017	Seth Packrone	0:06:00	Billable	Edit proposal for finishing expert report
9/27/2017	Seth Packrone	0:06:00	Billable	Send proposal to team with request for follow up
9/28/2017	Mary-Lee Smith	0:30:00	Billable	Call w/ team re expert access; court call; and doc review
9/28/2017	Seth Packrone	0:06:00	Billable	Review T. Borden's research on ELL in the context of IDEA
9/28/2017	Seth Packrone	0:18:00	Billable	Review ELL legal provisions and correspond with T. Borden re: same
9/28/2017	Seth Packrone	0:36:00	Billable	Tc with G. Bueno, J. LoCicero, B. Friedman, expert, and M. Vomacka
9/28/2017	Seth Packrone	0:18:00	Billable	Follow up tc with team re: next steps after call with opposing counsel
9/28/2017	Seth Packrone	0:06:00	Billable	Tc with M. Smith and P. Leahy re: drafting order and talking points for call with court on Tuesday
9/28/2017	Seth Packrone	0:24:00	Billable	Draft proposed consent order for remainder of expert's work
9/28/2017	Seth Packrone	0:06:00	Billable	Send proposed order to team with notes for next steps
9/29/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: order and talking points for call with Judge
9/29/2017	Seth Packrone	0:06:00	Billable	Send proposed order to team with notes for next steps
10/2/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: draft consent order to send to Defendants
10/2/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: draft consent order
10/2/2017	Seth Packrone	0:06:00	Billable	Send draft consent order to Defendants
10/2/2017	Seth Packrone	0:06:00	Billable	Follow up with Defendants re: proposal for status report to court
10/2/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: plan for call tomorrow
10/2/2017	Seth Packrone	0:18:00	Billable	Draft talking points for call with court
10/2/2017	Seth Packrone	0:06:00	Billable	Follow up with team and defendants re: call tomorrow
10/3/2017	Seth Packrone	0:12:00	Billable	Prep for call with judge goodman and correspond with team re: same
10/3/2017	Seth Packrone	0:06:00	Billable	Wait for Judge Goodman on call with court re: discovery timeline
10/3/2017	Seth Packrone	0:12:00	Billable	Tc with Judge Goodman and legal team re: next steps for discovery process with expert
10/3/2017	Seth Packrone	0:06:00	Billable	Follow up tc with M. Smith re: next steps in case
10/3/2017	Seth Packrone	0:12:00	Billable	Update consent order and send to Defendants for their approval
10/3/2017	Seth Packrone	0:48:00	Billable	Tc with T. Borden re: legal provisions for identifying students over 18 in DOC custody, next steps for intakes, and potential OPRA requests

10/4/2017	Seth Packrone	0:06:00	Billable	Review consent decree and correspond with co-counsel re: filing
10/4/2017	Seth Packrone	0:06:00	Billable	Follow up with co-counsel re: filing consent order
10/4/2017	Seth Packrone	0:06:00	Billable	Review documents from expert and emails with opposing counsel
10/4/2017	Seth Packrone	0:06:00	Billable	Draft agenda/send to M. Smith and P. Leahy for additions
10/5/2017	Michelle Caiola	0:06:00	Billable	update on new attorney and next steps re mootness
10/5/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: agenda for today's meeting
10/5/2017	Seth Packrone	0:42:00	Billable	Tc with team (T. Borden, M. Smith, P. Leahy, and B. Friedman) re: next steps in case
10/5/2017	Seth Packrone	0:12:00	Billable	Follow up tc with t. Borden and B. Friedman re: next steps for intakes and doc review
10/5/2017	Seth Packrone	0:06:00	Billable	Follow up with P. Leahy re: work for doc review
10/6/2017	Mary-Lee Smith	0:12:00	Billable	Review email from SP to expert re org. client
10/6/2017	Seth Packrone	0:06:00	Billable	Review/follow up on expert's invoices
10/6/2017	Seth Packrone	0:18:00	Billable	Follow up with team re: intakes, specific student at DOC facility
10/6/2017	Seth Packrone	0:06:00	Billable	Confer with M. Smith re: draft to expert about specific student at DOC facility
10/6/2017	Seth Packrone	0:06:00	Billable	Follow up with expert n re: specific student at DOC facility
10/6/2017	Seth Packrone	0:06:00	Billable	Follow up with J. LoCicero re: informing defendants that we still expect them to produce DOE documents
10/10/2017	Seth Packrone	0:12:00	Billable	Check in with M. Smith re: items to complete this week
10/10/2017	Seth Packrone	0:06:00	Billable	Follow up with expert re: student at DOC facility
10/10/2017	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: next steps for case
10/11/2017	Seth Packrone	0:06:00	Billable	Check in with M. Smith re: workload moving forward
10/11/2017	Seth Packrone	0:12:00	Billable	Correspond with T. Borden re: next steps for meetings in case
10/11/2017	Seth Packrone	0:06:00	Billable	Give J. Mukherjee directions re: processing documents from Defendants
10/11/2017	Seth Packrone	0:06:00	Billable	Follow up with client re; meeting
10/12/2017	Mary-Lee Smith	0:30:00	Billable	Call w/ co-counsel re status of doc production and potential additional plaintiffs
10/12/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: responding to expert
10/12/2017	Seth Packrone	0:06:00	Billable	Follow up with T. Borden re: plan for call
10/12/2017	Seth Packrone	0:30:00	Billable	Tc with team re: next steps in litigation (M. Smith, T. Borden, and B. Friedman)
10/12/2017	Seth Packrone	0:06:00	Billable	Follow up with Defendants re: discovery meet and confer
10/13/2017	Seth Packrone	0:06:00	Billable	Follow up with expert re: prep for meet and confer
10/13/2017	Seth Packrone	0:24:00	Billable	Tc with client and T. Borden re: student at DOC facility
10/13/2017	Seth Packrone	0:06:00	Billable	Follow up on meet and confer with Defendants and expert
10/15/2017	Seth Packrone	0:06:00	Billable	Review tags for upcoming doc review in Adam X.
10/16/2017	Mary-Lee Smith	0:24:00	Billable	Review doc coding and email exchange w/ SP re same
10/16/2017	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: next steps for case
10/16/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: call with Ds
10/16/2017	Seth Packrone	0:42:00	Billable	Tc with Ds and expert, J. LoCicero, T. Borden, and B. Friedman
10/16/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: update from meeting with Ds
10/16/2017	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re; call with impacted org.
10/16/2017	Seth Packrone	0:12:00	Billable	Review discovery categories and tags
10/16/2017	Seth Packrone	0:12:00	Billable	Spot check document review

10/16/2017	Seth Packrone	0:12:00	Billable	Check in with M. Smith re: document review and next steps
10/16/2017	Seth Packrone	0:06:00	Billable	Correspond with impacted org. re: call tomorrow
10/17/2017	Mary-Lee Smith	0:24:00	Billable	Call w/ SP re doc review and timing
10/17/2017	Seth Packrone	0:42:00	Billable	Tc with impacted org. and T. Borden re: intakes
10/17/2017	Seth Packrone	0:12:00	Billable	Follow up tc with T. Borden re: next steps in case
10/17/2017	Seth Packrone	0:06:00	Billable	update M. Smith re: call
10/17/2017	Seth Packrone	0:06:00	Billable	Follow up on review of docs up to this point
10/17/2017	Seth Packrone	0:18:00	Billable	Tc with M. Smith re: plan for call with Proskauer and new document codes
10/17/2017	Seth Packrone	0:18:00	Billable	Draft proposal for next steps for doc review to send to M. Smith
10/17/2017	Seth Packrone	0:06:00	Billable	Further update doc codes based on M. Smith's feedback
10/18/2017	Seth Packrone	0:06:00	Billable	Correspond with team and M. Smith re: revised discovery codes/tags
10/18/2017	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: prep for discovery call with co-counsel
10/18/2017	Seth Packrone	0:42:00	Billable	Tc with T. Borden, B. Friedman and doc review team re: feedback on first round of doc review and strategies for moving forward
10/18/2017	Seth Packrone	0:30:00	Billable	Tc with T. Borden re: letter report to court and next steps for discovery
10/18/2017	Seth Packrone	0:12:00	Billable	Review/submit letter to Defendants re: status report on discovery
10/18/2017	Seth Packrone	0:06:00	Billable	Draft agenda for weekly team meeting and send to M. Smith
10/18/2017	Seth Packrone	0:06:00	Billable	Update M. Smith re: discovery call and agenda
10/18/2017	Seth Packrone	0:06:00	Billable	Follow up with T. Borden re: editing letter to court
10/18/2017	Seth Packrone	0:06:00	Billable	Follow up with Defendants re: status report to court
10/18/2017	Seth Packrone	0:06:00	Billable	Send agenda to team for feedback for tomorrow's meeting
10/19/2017	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: next steps for doc review
10/19/2017	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: status of Defendants' letter to court
10/19/2017	Seth Packrone	0:12:00	Billable	Finalize letter to be send to court re: status of discovery
10/19/2017	Seth Packrone	0:30:00	Billable	Team meeting with T. Borden, E. Huertas, J. LoCicero, and B. Friedman
10/19/2017	Seth Packrone	0:06:00	Billable	Correspond with Ds re: discovery status letter to court
10/20/2017	Seth Packrone	0:06:00	Billable	Reviewed filed letter with court re: discovery status
10/20/2017	Seth Packrone	0:06:00	Billable	Follow up on team emails re: doc review and invoices
10/22/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: follow up on doc review
10/23/2017	Seth Packrone	0:06:00	Billable	Follow up with team re; doc review moving forward
10/23/2017	Seth Packrone	0:06:00	Billable	Discovery follow up logistics with J. Mukherjee re: managing Ds productions
10/24/2017	Seth Packrone	0:06:00	Billable	Follow up with T. Borden re: status of doc reiew
10/24/2017	Seth Packrone	0:12:00	Billable	Correspond with team re: Ds request for extension and responding
10/24/2017	Seth Packrone	0:12:00	Billable	Follow up with team with proposal for responding to Ds re: extension request
10/24/2017	Seth Packrone	0:06:00	Billable	Follow up with Ds and expert re: extension request
10/25/2017	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: responding to Ds extension request
10/25/2017	Seth Packrone	0:06:00	Billable	Review sample docs from doc review team to provide feedback
10/25/2017	Seth Packrone	0:12:00	Billable	Update M. Smith re: status of case and next steps
10/25/2017	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: next steps with doc review
10/25/2017	Seth Packrone	0:06:00	Billable	Revise letter to court and respond to T. Borden

10/25/2017	Seth Packrone	0:06:00	Billable	Check in with T. Borden re: plan for call and next steps for feedback on doc review
10/26/2017	Seth Packrone	0:12:00	Billable	Follow up with T. Borden re: status of doc review
10/26/2017	Seth Packrone	0:30:00	Billable	TC with co-counsel re: doc review
10/28/2017	Seth Packrone	0:06:00	Billable	Review Ds letter to court and correspondence with expert in case
10/28/2017	Seth Packrone	0:54:00	Billable	Redraft intake procedures for upcoming intakes
10/28/2017	Seth Packrone	0:12:00	Billable	Update doc review protocol
10/28/2017	Seth Packrone	0:18:00	Billable	Draft update to M. Smith with docs attached and notes for next steps for doc review
10/30/2017	Seth Packrone	0:06:00	Billable	Review correspondence btw Ds and expert
10/31/2017	Mary-Lee Smith	0:18:00	Billable	Call w/ SP re call w/ org. plaintiff
10/31/2017	Seth Packrone	0:06:00	Billable	Follow up with T. Borden re: tags/categories for meeting and next steps
10/31/2017	Seth Packrone	0:06:00	Billable	Follow up with C. Bowman re: status of doc review and updated tags
10/31/2017	Seth Packrone	0:12:00	Billable	Review NJDOC docs turned over to compile intake list
10/31/2017	Seth Packrone	0:06:00	Billable	Follow up with T. Borden re: upcoming intakes and intake materials
10/31/2017	Seth Packrone	0:18:00	Billable	Tc with T. Borden and C. Bowman re: next steps for doc review
10/31/2017	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: clarifying intake list
10/31/2017	Seth Packrone	0:12:00	Billable	Review correspondence btw Expert and Ds
10/31/2017	Seth Packrone	0:06:00	Billable	Edit intake forms based on M. Smith's comments
10/31/2017	Seth Packrone	0:06:00	Billable	Send intake forms to T. Borden with notes for next steps
11/1/2017	Seth Packrone	0:12:00	Billable	Follow up on emails with team re: document production and review emails from Ds
11/1/2017	Seth Packrone	0:12:00	Billable	Review/sort updated disco requests from expert
11/1/2017	Seth Packrone	0:06:00	Billable	Correspond with Defendants re: upcoming productions
11/1/2017	Seth Packrone	0:06:00	Billable	Follow up with T. Borden re: agenda for tomorrow
11/2/2017	Seth Packrone	0:06:00	Billable	Follow up with t. Borden re: visiting clients
11/2/2017	Seth Packrone	0:18:00	Billable	Team call with T. Borden, B. Friedman, J. LoCicero, and M. Smith re: update on doc review and intake process
11/2/2017	Seth Packrone	0:06:00	Billable	Follow up tc with M. Smith re: outstanding items in case
11/2/2017	Seth Packrone	0:12:00	Billable	Correspond with T. Borden re: visits next week and background check forms
11/2/2017	Seth Packrone	0:12:00	Billable	Follow up with M. Smith re: doc production to DG
11/2/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: doc production to expert
11/3/2017	Seth Packrone	0:12:00	Billable	Review/sort named plaintiffs' education docs to review to turn them over to expert
11/3/2017	Seth Packrone	0:06:00	Billable	Review Confidentiality Order to mark named plaintiffs' documents
11/3/2017	Seth Packrone	0:06:00	Billable	Send docs to team with notes for turning them over to Ds
11/3/2017	Seth Packrone	0:06:00	Billable	Follow up with expert re: requested documents
11/3/2017	Seth Packrone	0:18:00	Billable	Tc with T. Borden re: next steps for client visits next week
11/3/2017	Seth Packrone	0:06:00	Billable	Update M. Smith re: plan for production and client visits
11/3/2017	Seth Packrone	0:06:00	Billable	Give directions to J. Mukherjee re: contacting prison s
11/3/2017	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: update on DOC facility
11/3/2017	Seth Packrone	0:12:00	Billable	Tc with DOC facility administrator re: setting up attorney visit
11/3/2017	Seth Packrone	0:12:00	Billable	Tc with T. Borden and DOC facility re: setting up client visit
11/3/2017	Seth Packrone	0:06:00	Billable	Follow up tc with T. Borden re: client visits

11/3/2017	Seth Packrone	0:54:00	Billable	Review named plaintiff docs to produce to expert
11/3/2017	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: doc review of named plaintiffs docs
11/3/2017	Seth Packrone	0:06:00	Billable	Send J. Mukherjee instructions re: producing documents
11/6/2017	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: status of plaintiffs production and next steps
11/6/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: expert emails
11/6/2017	Seth Packrone	0:12:00	Billable	Follow up with J. Mukherjee re: instructions for production
11/6/2017	Seth Packrone	0:06:00	Billable	Follow up re: status of client visits on Wednesday
11/6/2017	Seth Packrone	0:54:00	Billable	Review/finalize doc production for named plaintiffs per expert request
11/6/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: timing for doc production for named plaintiffs
11/6/2017	Seth Packrone	0:12:00	Billable	Check in with J. Mukherjee re: latest production by Defendants and error in index
11/6/2017	Seth Packrone	0:06:00	Billable	Follow up with J. Mukherjee re: mistake in Defendants' index and next steps
11/6/2017	Seth Packrone	0:06:00	Billable	Prep for client visits
11/7/2017	Seth Packrone	0:06:00	Billable	Review correspondence from opposing counsel re: notes on doc production
11/7/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith re: plan for document production
11/7/2017	Seth Packrone	0:06:00	Billable	Draft outstanding items list and next steps
11/7/2017	Seth Packrone	0:12:00	Billable	Send named plaintiffs' documents to expert and defendants
11/7/2017	Seth Packrone	0:06:00	Billable	Review Ds letter to judge and follow up with team
11/7/2017	Seth Packrone	0:30:00	Billable	Draft status report of case for M. Smith
11/7/2017	Seth Packrone	0:12:00	Billable	Follow up with M. Smith re: case status report and plan for site visits moving forward
11/7/2017	Seth Packrone	0:06:00	Billable	Review org client's input re: student at DOC facility with intellectual disability
11/7/2017	Seth Packrone	0:12:00	Billable	Draft follow up for Defendants about student at DOC facility with intellectual disability
11/7/2017	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: follow up with Ds about DOC facility student
11/7/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: email to Defendants about at-risk young person at DOC facility
11/7/2017	Seth Packrone	0:06:00	Billable	Tc with T. Borden re: plan for site visits
11/7/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Smith re: plan for site visits
11/7/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: plan for site visits
11/7/2017	Seth Packrone	0:12:00	Billable	Send proposal to expert and defendants re: upcoming site visits
11/8/2017	Seth Packrone	0:06:00	Billable	Tc with T. Borden re: next steps in case
11/8/2017	Seth Packrone	0:12:00	Billable	Follow up with co-counsel and M. Smith re: site visit dates and staffing
11/8/2017	Seth Packrone	0:06:00	Billable	Follow up with Defendants re: proposal for scheduling site visits
11/8/2017	Seth Packrone	0:06:00	Billable	Follow up with T. Borden re: client's diploma status
11/8/2017	Seth Packrone	0:06:00	Billable	Follow up with expert re: expert's outstanding requests and creating an index for plaintiffs' documents
11/8/2017	Seth Packrone	0:18:00	Billable	Draft short memo for M. Smith re: client's diploma status
11/8/2017	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: next steps for client
11/8/2017	Seth Packrone	0:06:00	Billable	Draft agenda for team call and send to co-counsel
11/8/2017	Seth Packrone	0:36:00	Billable	Travel to DOC facility for client (bill half, exclude the other half)
11/8/2017	Seth Packrone	0:48:00	Billable	Meet with client re: update about case
11/8/2017	Seth Packrone	0:06:00	Billable	Processing at DOC facility to visit client
11/8/2017	Seth Packrone	0:12:00	Billable	Processing at DOC facility to visit client

11/8/2017	Seth Packrone	0:48:00	Billable	Meet with client re: update on status of case
11/8/2017	Seth Packrone	0:12:00	Billable	Tc with impacted org. re: NJ Step program
11/8/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: plan for next call
11/8/2017	Seth Packrone	0:06:00	Billable	Travel to DOC facility (bill half, exclude half)
11/8/2017	Seth Packrone	0:42:00	Billable	Travel back from DOC Facility (bill half, exclude half)
11/8/2017	Seth Packrone	0:18:00	Billable	Wait at DOC facility and get processed to visit client
11/8/2017	Seth Packrone	0:30:00	Billable	Meet with client re: update on case
11/9/2017	Seth Packrone	0:06:00	Billable	Correspond with Defendants and expert re: next site visits
11/9/2017	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: site visits
11/9/2017	Seth Packrone	0:18:00	Billable	Review client's docs from NJDOC discovery
11/9/2017	Seth Packrone	0:12:00	Billable	Draft update on client to co-counsel
11/9/2017	Seth Packrone	0:30:00	Billable	Tc with team (M. Smith, P. Leahy, T. Borden, E. Huertas, J. LoCicero, and B. Friedman)
11/9/2017	Seth Packrone	0:18:00	Billable	Draft client update for Defendants
11/9/2017	Seth Packrone	0:12:00	Billable	Correspond with and input T. Borden's changes to client's proposal and send to team
11/9/2017	Seth Packrone	0:06:00	Billable	Send NJ-STEP request to Defendants
11/10/2017	Seth Packrone	0:06:00	Billable	Give J. Mukherjee directison re: tracking defendants' document production
11/10/2017	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: final versions of site visit memos
11/10/2017	Seth Packrone	0:06:00	Billable	Correspond with J. Mukherjee re: mistakes in Ds production and updating case status memo
11/13/2017	Seth Packrone	0:06:00	Billable	Check in with J. Mukherjee re: status of index for expert
11/13/2017	Seth Packrone	0:24:00	Billable	Edit index for expert
11/13/2017	Seth Packrone	0:06:00	Billable	Follow up with M. Smith and P. Leahy and J. Mukherjee re: next steps for index
11/14/2017	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: finalizing site visits for next week
11/14/2017	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: status of site visits
11/14/2017	Seth Packrone	0:06:00	Billable	Finalize/send index to Defendants
11/14/2017	Seth Packrone	0:06:00	Billable	Follow up with expert in case
11/15/2017	Michelle Caiola	0:12:00	Billable	confer re handling court conf/status thru jan,with SP
11/15/2017	Seth Packrone	0:06:00	Billable	Follow up with defendants re: client's NJSTEP application
11/15/2017	Seth Packrone	0:06:00	Billable	Correspond with T. Borden and Ds re: interview schedule on Monday
11/15/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: call with court and plan for weekly call
11/15/2017	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: talking points for court call tomorrow
11/15/2017	Seth Packrone	0:06:00	Billable	Correspond with team re: agenda for tomorrow and other items to add
11/15/2017	Seth Packrone	0:12:00	Billable	Tc with P. Leahy re: case mgmt moving forward
11/16/2017	Seth Packrone	0:06:00	Billable	Follow up with team and opposing counsel re: laptop order signed by judge
11/16/2017	Seth Packrone	0:12:00	Billable	Prep for call and write up points to discuss with judge
11/16/2017	Seth Packrone	0:06:00	Billable	Review defendants' letter and our response
11/16/2017	Seth Packrone	0:12:00	Billable	Tc with Judge Goodman and opposing counsel and T. Borden and J. LoCicero
11/16/2017	Seth Packrone	0:36:00	Billable	Follow up tc with team (J. LoCicero, T. Borden, and B. Friedman) re: next steps, prep for site visits, schedule for expert report
11/16/2017	Seth Packrone	0:06:00	Billable	Update team re: next court dates
11/16/2017	Seth Packrone	0:12:00	Billable	Review list of people allowed to know Plaintiffs' names and correspond with T. Borden re: same

11/16/2017	Seth Packrone	0:06:00	Billable	Edit consent order based on T. Borden's comments
11/16/2017	Seth Packrone	0:12:00	Billable	Follow up with opposing counsel re: status of NJ STEP information
11/16/2017	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: background check form
11/16/2017	Seth Packrone	0:06:00	Billable	Give directions to P. Leahy re: notes
11/16/2017	Seth Packrone	0:12:00	Billable	Correspond with opposing counsel re: follow up on NJ STEP program
11/16/2017	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: next week's visits
11/16/2017	Seth Packrone	0:06:00	Billable	Review draft consent order
11/16/2017	Seth Packrone	0:06:00	Billable	Send draft consent order with edits to Ds
11/17/2017	Seth Packrone	0:12:00	Billable	Review correspondence with defendants and experts and review attached documents
11/17/2017	Seth Packrone	0:18:00	Billable	Prep for site visit at NJDOC facility
11/17/2017	Seth Packrone	0:06:00	Billable	Follow up on client documents with T. Borden
11/18/2017	Seth Packrone	0:30:00	Billable	Review/analyze site visit memos to prep for DOC facility visit on Monday
11/19/2017	Seth Packrone	0:06:00	Billable	Review new agenda from expert
11/20/2017	Seth Packrone	0:36:00	Billable	Travel from Jersey City to DOC Facility for site visit with expert (total was 1.2, bill half, exclude half)
11/20/2017	Seth Packrone	0:30:00	Billable	Meeting with opposing counsel and expert at DOC facility site visit
11/20/2017	Seth Packrone	1:18:00	Billable	Tour of facility with expert, meet with client, and communicate with opposing counsel re: NJ Step program at site visit with expert in case
11/20/2017	Seth Packrone	1:00:00	Billable	Conference with opposing party with expert re: next steps for the rest of the day and attendance in vocational programs
11/20/2017	Seth Packrone	0:36:00	Billable	Wait to go to SMU, travel to SMU with expert, tour SMU, and return for expert visit at DOC facility
11/20/2017	Seth Packrone	0:18:00	Billable	Strategy session with T. Borden re: status of expert visit and plan for remainder of day
11/20/2017	Seth Packrone	0:48:00	Billable	Expert returns with update from interviews and goes over new requests for information at site visit with expert
11/20/2017	Seth Packrone	0:36:00	Billable	Summary of the day from expert at expert site visit at DOC facility
11/20/2017	Seth Packrone	0:36:00	Billable	Travel from DOC Correctional City back to Jersey City for site visit with expert (total was 1.2, bill half, exclude half)
11/21/2017	Seth Packrone	0:06:00	Billable	Follow up on site visit with M. Goodell
11/21/2017	Seth Packrone	0:06:00	Billable	Tc with P. Leahy re: plan for call
11/21/2017	Seth Packrone	0:42:00	Billable	Tc with team (B. Friedman, P. Leahy, J. LoCicero, C. Bowman, and T. Borden) re: update on site visits and next steps in case
11/21/2017	Seth Packrone	0:18:00	Billable	Tc with T. Borden re: follow up debrief on site visit
11/22/2017	Seth Packrone	0:06:00	Billable	Correspond with P. Leahy re: notes from call and strategy for expert report
11/27/2017	Maia Goodell	0:18:00	Billable	review case status memo (new to case)
11/27/2017	Michelle Caiola	0:12:00	Billable	Discuss expert report/co-counsel strategy
11/28/2017	Maia Goodell	1:18:00	Billable	review complaint and site visit summaries (new to case)
11/29/2017	Seth Packrone	0:06:00	Billable	Review new doc requests from expert
11/29/2017	Seth Packrone	0:06:00	Billable	Draft agenda for team call
11/29/2017	Seth Packrone	0:06:00	Billable	Follow up with team re: meeting and agenda
11/29/2017	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: next steps for intakes and NJ STEP
11/30/2017	Maia Goodell	0:12:00	Billable	call with co-counsel re case status
11/30/2017	Maia Goodell	0:42:00	Billable	strategy and planning for settlement, intakes
11/30/2017	Seth Packrone	0:12:00	Billable	Tc with T. Borden, J. LoCicero, M. Goodell, B. Silverman, and P. Leahy re: update on case and any next steps
11/30/2017	Seth Packrone	0:36:00	Billable	Strategy session with M. Goodell re: overview of issues in case
11/30/2017	Seth Packrone	0:06:00	Billable	Review P. Leahy's notes and follow up after meeting

11/30/2017	Seth Packrone	0:06:00	Billable	Review Ds production and follow up with team
12/1/2017	Seth Packrone	0:06:00	Billable	Correspond with co-counsel and J. Mukherjee re: production from Defendants
12/1/2017	Seth Packrone	0:06:00	Billable	Review documents from site visit and additional docs
12/1/2017	Seth Packrone	0:06:00	Billable	Contact client's family re: original documents and give J. Mukherjee instructions re: same
12/1/2017	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: follow up on NJ Step and intakes
12/4/2017	Michelle Caiola	0:06:00	Billable	SP status check
12/4/2017	Seth Packrone	0:06:00	Billable	Update M. Caiola re: status of case and next steps for potential settlement
12/4/2017	Seth Packrone	0:42:00	Billable	Tc with T. Borden re: next steps for intakes
12/4/2017	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: plan for intakes
12/4/2017	Seth Packrone	0:12:00	Billable	Respond to Ds re: nJSTEP update
12/4/2017	Seth Packrone	0:12:00	Billable	Follow up with co-counsel re: weekly calls and documents from defendants
12/5/2017	Seth Packrone	0:06:00	Billable	Follow up with T. Borden re: call with client
12/5/2017	Seth Packrone	0:06:00	Billable	Review defendants emails re: new index/updated discovery
12/6/2017	Maia Goodell	0:12:00	Billable	review status and strategy, update re potential organizational plaintiff
12/6/2017	Maia Goodell	0:24:00	Billable	strategy for communications with opposing counsel re individual plaintiff education
12/6/2017	Seth Packrone	0:18:00	Billable	Strategy session with M. Goodell re: NJ Step program and next steps
12/6/2017	Seth Packrone	0:06:00	Billable	Correspond with t. borden re: update on NJ Step and moving meeting
12/7/2017	Seth Packrone	0:06:00	Billable	Follow up with T. borden re: call with client
12/7/2017	Seth Packrone	0:42:00	Billable	Review/take notes/analyze Defendants' discovery response to expert's requests
12/7/2017	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: plan for call with client and discovery update
12/7/2017	Seth Packrone	0:18:00	Billable	Tc with client re: NJSTEP program and next visit
12/7/2017	Seth Packrone	0:06:00	Billable	Follow up tc with T. Borden re: next steps in case
12/7/2017	Seth Packrone	0:12:00	Billable	Follow up with J. Mukherjee re: letter to client
12/11/2017	Seth Packrone	0:06:00	Billable	Follow up with co-counsel re: next steps for intakes
12/11/2017	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: responding to Ds discovery response
12/13/2017	Seth Packrone	0:12:00	Billable	Follow up with T. Borden re: plan for call and discovery issues
12/14/2017	Maia Goodell	0:18:00	Billable	call with co-counsel re case status
12/15/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Goodell re: format and length of deficiency letter
12/18/2017	Seth Packrone	0:24:00	Billable	Legal research re: deficiency letter
12/18/2017	Seth Packrone	0:12:00	Billable	Review Defendants' discovery response to draft deficiency letter
12/18/2017	Seth Packrone	0:36:00	Billable	Draft deficiency letter
12/18/2017	Seth Packrone	0:12:00	Billable	Edit deficiency letter
12/18/2017	Seth Packrone	0:06:00	Billable	Send deficiency letter draft to M. Goodell
12/19/2017	Maia Goodell	0:12:00	Billable	review and supplement letter to opposing counsel re document production deficiencies
12/19/2017	Seth Packrone	0:06:00	Billable	Correspond with M. Goodell re: additions to deficiency letter draft
12/19/2017	Seth Packrone	0:06:00	Billable	Review outstanding doc requests from DOC
12/19/2017	Seth Packrone	0:12:00	Billable	Edit deficiency letter based on M. Goodell's edits
12/19/2017	Seth Packrone	0:06:00	Billable	Send to team with notes for next steps
12/19/2017	Seth Packrone	0:06:00	Billable	Review notes from team meeting last week to draft deficiency letter

12/19/2017	Seth Packrone	0:06:00	Billable	Correspond with co-counsel re: edits to deficiency letter
12/19/2017	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: plan for intakes in January
12/20/2017	Seth Packrone	0:18:00	Billable	Edit and finalize deficiency letter
12/20/2017	Seth Packrone	0:06:00	Billable	Cite check deficiency letter
12/20/2017	Seth Packrone	0:06:00	Billable	Send final draft to team with note for sending to defendants
12/20/2017	Seth Packrone	0:06:00	Billable	Send deficiency letter to opposing counsel
12/21/2017	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: next steps for intakes in January
12/21/2017	Seth Packrone	0:06:00	Billable	Follow up with T. Borden re: plan for intakes
12/21/2017	Seth Packrone	0:12:00	Billable	Send T. Borden letter draft for intakes and thoughts on next steps for setting them up
12/21/2017	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: plan for intakes and most up to date index
12/21/2017	Seth Packrone	0:06:00	Billable	Follow up with J. Mukherjee and T. Borden re: new index for DOC documents
1/2/2018	Seth Packrone	0:12:00	Billable	Review plan for Monday and follow up with T. Borden re: same
1/3/2018	Seth Packrone	0:18:00	Billable	Tc with T. Borden re: next steps for intakes and plan for tomorrow's call
1/3/2018	Seth Packrone	0:12:00	Billable	Draft agenda and circulate for tomorrow's team call
1/4/2018	Maia Goodell	0:18:00	Billable	planning call re intakes, document production deficiencies
1/4/2018	Seth Packrone	0:12:00	Billable	Review PHV documents to file for M. Goodell and letter of withdrawal for M. Smith
1/4/2018	Seth Packrone	0:06:00	Billable	Give J. Mukherjee directions re: PHV filing and letter of withdrawal
1/4/2018	Seth Packrone	0:18:00	Billable	Team call with J. LoCicero, P. Leahy, M. Goodell, B. Silverman, and C. Bowman
1/4/2018	Seth Packrone	0:06:00	Billable	Correspond with opposing counsel re: deficiency letter
1/5/2018	Seth Packrone	0:06:00	Billable	Update intake forms based on T. Borden's edits
1/5/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: plan for Monday's intakes
1/5/2018	Seth Packrone	0:12:00	Billable	Prep for Monday's intakes
1/5/2018	Seth Packrone	0:12:00	Billable	Correspond with T. Borden re: docs and plan for Monday's intakes
1/5/2018	Seth Packrone	0:12:00	Billable	Review documents from NJDOC to take with us to Monday's intakes
1/5/2018	Seth Packrone	0:06:00	Billable	Give B. Mousavi instructions re: documents for Monday
1/5/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden and team re: Nebula training session
1/8/2018	Seth Packrone	1:12:00	Billable	Travel to and from intakes at DOC Correctional Facility about special education issues (bill half, exclude half)
1/8/2018	Seth Packrone	0:24:00	Billable	Debrief intakes with T. Borden re: take aways and next steps
1/8/2018	Seth Packrone	3:18:00	Billable	Four intakes at DOC Correctional Facility
1/8/2018	Seth Packrone	0:24:00	Billable	Process/waiting at DOC facility while conducting 4 intakes
1/8/2018	Seth Packrone	0:18:00	Billable	Review Ds response to deficiency letter and prep response to circulate to team
1/9/2018	Maia Goodell	0:12:00	Billable	review pro hac vice papers
1/9/2018	Seth Packrone	0:06:00	Billable	Send response to opposing counsel re: their request for consent form from plaintiffs to get client's documents
1/9/2018	Seth Packrone	0:06:00	Billable	Follow up with team re: doc review training session
1/10/2018	Seth Packrone	0:12:00	Billable	Correspond with T. Borden re: Nebula meeting, follow up about intakes, and tomorrow's co-counsel meeting
1/10/2018	Seth Packrone	0:06:00	Billable	Follow up with team re: plan for meeting this week
1/10/2018	Seth Packrone	0:06:00	Billable	Follow up with opposing counsel re: status of request for named plaintiff's documents
1/10/2018	Seth Packrone	0:06:00	Billable	Correspond with M. Goodell re: PHV application and letter of withdrawal
1/11/2018	Seth Packrone	0:12:00	Billable	Draft response for team to opposing counsel re: outstanding documents and next steps for production to expert

1/11/2018	Seth Packrone	0:06:00	Billable	Follow up with C. Bowman re: Defendants latest production of documents
1/11/2018	Seth Packrone	0:06:00	Billable	Give J. Mukherjee directions re: latest document production by Defendants
1/11/2018	Seth Packrone	0:06:00	Billable	Follow up with team re: potentially changing the deadline for expert's report
1/11/2018	Seth Packrone	0:12:00	Billable	Correspond with team re: following up about DP with Defendants
1/12/2018	Seth Packrone	0:12:00	Billable	Follow up with opposing counsel re: DP and status of document production
1/12/2018	Seth Packrone	0:06:00	Billable	Give J. Mukherjee directions re: letter of withdrawal and PHV materials
1/17/2018	Seth Packrone	0:06:00	Billable	Review/analyze Ds discovery response to expert's requests
1/17/2018	Seth Packrone	0:12:00	Billable	Update team re: Ds discovery responses to expert's requests
1/17/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: agenda items for tomorrow and Nebula training plan
1/17/2018	Seth Packrone	0:12:00	Billable	Correspond with T. Borden re: next intakes, Ds production, and plan for site visit memos
1/17/2018	Seth Packrone	0:06:00	Billable	Follow up re: plan for intakes next Thursday
1/18/2018	Maia Goodell	0:12:00	Billable	planning for client visits and intakes
1/18/2018	Seth Packrone	0:12:00	Billable	Strategy session with M. Goodell re: status of case and next steps
1/18/2018	Seth Packrone	0:30:00	Billable	Weekly co-counsel call with team re: next steps for discovery and expert's report and intakes
1/18/2018	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: plan for weekly call
1/18/2018	Seth Packrone	0:12:00	Billable	Draft response to Defendants re: proposal for extension for expert report
1/19/2018	Maia Goodell	0:30:00	Billable	review communication and draft response to opposing counsel re document production; communications with co-counsel re same
1/19/2018	Michelle Caiola	0:06:00	Billable	update from SP re co-counsel
1/19/2018	Seth Packrone	0:06:00	Billable	Correspond with team and Defendants re: ongoing discovery issue and deadline for expert's report
1/19/2018	Seth Packrone	0:12:00	Billable	Draft response to Defendants
1/19/2018	Seth Packrone	0:12:00	Billable	Correspond with co-counsel re: response to Ds
1/19/2018	Seth Packrone	0:12:00	Billable	Check in with M. Goodell re: response to Ds
1/19/2018	Seth Packrone	0:12:00	Billable	Check in with M. Goodell re: next steps for responding to Defendants
1/22/2018	Maia Goodell	0:24:00	Billable	review defendant response re document production; strategy re response
1/22/2018	Seth Packrone	0:12:00	Billable	Review emails with team re: status of discovery and next steps for site visits
1/22/2018	Seth Packrone	0:24:00	Billable	Tc with T. Borden re; status of Ds production and next steps
1/22/2018	Seth Packrone	0:18:00	Billable	Tc with T. Borden re: next steps in discovery dispute
1/22/2018	Seth Packrone	0:06:00	Billable	Tc with T. Borden re: plan to call Ds and information to seek
1/22/2018	Seth Packrone	0:24:00	Billable	Strategy session with M. Goodell re: Ds latest response and information needed
1/22/2018	Seth Packrone	0:06:00	Billable	Draft response to Ds
1/22/2018	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: deliberative process privilege
1/22/2018	Seth Packrone	0:06:00	Billable	Research deliberative process privilege
1/23/2018	Seth Packrone	0:12:00	Billable	Review documents from NJDOC to determine status of production
1/23/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: status of ds production and deliberative privilege
1/23/2018	Seth Packrone	0:06:00	Billable	Follow up with co-counsel re: list for intakes for and status of document production
1/23/2018	Seth Packrone	0:06:00	Billable	Give J. Mukherjee instructions re: setting up attorney visits
1/23/2018	Seth Packrone	0:24:00	Billable	Finalize plan for Monday's intake and client visits
1/24/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: status of ds production of Casey Z.'s file
1/24/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: Ds position on doc production and next steps

1/24/2018	Seth Packrone	0:06:00	Billable	Work with T. Borden re: crafting message to confirm conversation with Ds about status of production
1/24/2018	Seth Packrone	0:18:00	Billable	Tc with T. Borden re: responding to Ds privilege assertion
1/24/2018	Seth Packrone	0:06:00	Billable	Follow up with impacted organization re: issues at Garden State
1/24/2018	Seth Packrone	0:06:00	Billable	Follow up with team re: production of documents and review new index to determine what Ds produced
1/24/2018	Seth Packrone	0:24:00	Billable	Draft memo re: 11/20 visit with Gagnon to Garden State
1/25/2018	Maia Goodell	0:12:00	Billable	prep for visits with intakes and clients
1/25/2018	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: prep for Monday's intakes and documents to take along
1/25/2018	Seth Packrone	0:42:00	Billable	Complete site visit memo for Nov. 20 visit with Gagnon based on my notes
1/25/2018	Seth Packrone	0:30:00	Billable	Review and incorporate T. Borden's notes from Nov. 20 site visit into site visit memo
1/25/2018	Seth Packrone	0:24:00	Billable	Revise/edit November site visit memos (both mine and T. Borden 11/21 site visit memo) and send to team
1/26/2018	Michelle Caiola	0:06:00	Billable	Update on status of intakes from S. Packrone
1/26/2018	Seth Packrone	0:06:00	Billable	Prep for intakes with M. Goodell
1/26/2018	Seth Packrone	0:12:00	Billable	Give B. Mousavi directions re: prepping materials for intakes
1/26/2018	Seth Packrone	0:24:00	Billable	Follow up with client's parents to send documents
1/26/2018	Seth Packrone	0:06:00	Billable	Draft limited release for Casey Z. to get Doc documents
1/26/2018	Seth Packrone	0:18:00	Billable	Tc with T. Borden re: updates from her intakes and check in about status of document production
1/26/2018	Seth Packrone	0:06:00	Billable	Correspond with Arc of NJ and T. Borden re: update
1/26/2018	Seth Packrone	0:06:00	Billable	Prep for Monday's intakes
1/29/2018	Maia Goodell	0:42:00	Billable	Travel to DOC facility for intakes and client meeting (total 1.4; bill half)
1/29/2018	Maia Goodell	0:36:00	Billable	Review complaint and site visit memos to prep for meetings
1/29/2018	Maia Goodell	0:36:00	Billable	planning and strategy to prep for meetings
1/29/2018	Maia Goodell	0:54:00	Billable	Intake meeting with class member 1
1/29/2018	Maia Goodell	0:24:00	Billable	Intake meeting with potential witness 1
1/29/2018	Maia Goodell	0:54:00	Billable	Intake meeting with class member 2
1/29/2018	Maia Goodell	0:18:00	Billable	analysis of meetings and next steps
1/29/2018	Maia Goodell	1:00:00	Billable	Travel back from DOC facility for intakes and client meeting (total 2; bill half)
1/29/2018	Maia Goodell	0:06:00	Billable	review draft from opposing counsel re letter to court for extension request
1/29/2018	Maia Goodell	0:30:00	Billable	review recent caselaw re prison IDEA rights; review site visit memo
1/29/2018	Seth Packrone	0:42:00	Billable	Drive to DOC facility from Jersey City (bill half, total is 1.4)
1/29/2018	Seth Packrone	0:12:00	Billable	Wait and processing at DOC facility for intakes/client visits
1/29/2018	Seth Packrone	0:54:00	Billable	Intake with class member 1 re: education/disability issues at DOC facility
1/29/2018	Seth Packrone	0:54:00	Billable	Intakes with class member 2 re: education/disability issues at DOC facility
1/29/2018	Seth Packrone	0:24:00	Billable	Intake with potential witness re: education/disability issues at DOC facility
1/29/2018	Seth Packrone	0:36:00	Billable	Wait in attorney visit room at DOC facility for clients after intakes
1/29/2018	Seth Packrone	0:12:00	Billable	Meeting with client, Brian Y., re: update on case
1/29/2018	Seth Packrone	0:12:00	Billable	Drive to DOC facility for meeting with client (total was 20 min; bill half)
1/29/2018	Seth Packrone	0:30:00	Billable	Wait at DOC facility for meeting with Casey Z.
1/29/2018	Seth Packrone	0:42:00	Billable	Meeting with client, Casey Z., re: update on case
1/29/2018	Seth Packrone	0:06:00	Billable	Wait in attorney visit room to be released after visit with Casey Z.

1/29/2018	Seth Packrone	0:36:00	Billable	Drive back to Jersey City from DOC facility (bill half, total was 1.3)
1/29/2018	Seth Packrone	0:06:00	Billable	Review Defendants' letter re: update to the court
1/29/2018	Seth Packrone	0:12:00	Billable	Update team re: intakes and client visits
1/29/2018	Seth Packrone	0:18:00	Billable	Correspond with team re: responding to letter written by Defendants and spot checking production
1/30/2018	Seth Packrone	0:06:00	Billable	Follow up with T. Borden re: letters
1/30/2018	Seth Packrone	0:06:00	Billable	Tc with T. Borden re: docs requested by Gagnon
1/30/2018	Seth Packrone	0:24:00	Billable	Tc with T. Borden and C. Bowman re: potential audit to determine what has been produced
1/30/2018	Seth Packrone	0:12:00	Billable	Follow up tc with T. Borden re: next steps for case
1/30/2018	Seth Packrone	0:24:00	Billable	Review Defendants' production to determine if we have IEPs for students listed on index as having IEPs
1/30/2018	Seth Packrone	0:12:00	Billable	Correspond with T. Borden and C. Bowman re: response to Defendants about joint letter and missing documents
1/30/2018	Seth Packrone	0:18:00	Billable	Draft response to Defendants and follow up on missing documents
1/30/2018	Seth Packrone	0:06:00	Billable	Correspond with Defendants re: follow up on letter and documents
1/30/2018	Seth Packrone	0:06:00	Billable	Correspond with team re: next steps for case
1/31/2018	Maia Goodell	0:06:00	Billable	strategy for response to expert re use of names
1/31/2018	Seth Packrone	0:30:00	Billable	Tc with client (Arc of NJ) re: update on case
1/31/2018	Seth Packrone	0:06:00	Billable	Strategy session with M. Goodell re: format for report referring to students
1/31/2018	Seth Packrone	0:06:00	Billable	Follow up with team re: Gagnon's format for referring to students in report
1/31/2018	Seth Packrone	0:06:00	Billable	Draft agenda for team meeting
1/31/2018	Seth Packrone	0:06:00	Billable	Send agenda to team with notes for next meeting
1/31/2018	Seth Packrone	0:06:00	Billable	Follow up with Ds and Gagnon re: format for referring to students in report
1/31/2018	Seth Packrone	0:06:00	Billable	Correspond with Gagnon and Defendants re: format for referring to students
1/31/2018	Seth Packrone	0:06:00	Billable	Prep for call with client from Arc of NJ
1/31/2018	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: NJDOE's compliance report on DOC education
1/31/2018	Seth Packrone	0:06:00	Billable	Review NJDOE report on DOC education
2/1/2018	Seth Packrone	0:06:00	Billable	Follow up and compare Dr. Gagnon's document requests to index produced by Defendants
2/1/2018	Seth Packrone	0:06:00	Billable	Review settlement offer to Defendants and correspond with T. Borden re: same and most recent documents from Defendants
2/1/2018	Seth Packrone	0:06:00	Billable	Review notes from T. Borden's intake and evaluate based on claims in case and correspond with TB re: same
2/2/2018	Maia Goodell	0:30:00	Billable	analysis of intakes and client meetings; review of recent DOC report; plan next steps with S.Packrone, P. Leahy, and co-counsel
2/2/2018	Maia Goodell	0:18:00	Billable	planning and strategy for plaintiffs' position statement to Court with S.Packrone
2/2/2018	Seth Packrone	0:06:00	Billable	Follow up on documents from 1.31.18 Doc production
2/2/2018	Seth Packrone	0:18:00	Billable	Review/analyze DOE monitoring report on DOC facilities
2/2/2018	Seth Packrone	0:30:00	Billable	Tc with J. LoCicero, M. Goodell, B. Silverman, C. Bowman, and P. Leahy re: update on intakes/client meetings and next steps
2/2/2018	Seth Packrone	0:12:00	Billable	Follow up strategy session with M. Goodell re: next steps for case and settlement meeting
2/5/2018	Maia Goodell	0:30:00	Billable	review SFEA program monitoring report
2/5/2018	Seth Packrone	0:12:00	Billable	review/analyze DOE documents produced on 2.2.18
2/5/2018	Seth Packrone	0:24:00	Billable	Review docs produced by Ds and Ps to determine for Casey Z. to determine what is missing from Ds production
2/5/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: status of Casey Z.'s documents
2/5/2018	Seth Packrone	0:36:00	Billable	Draft notes from intakes with 3 students from 1.29.18 and send to T. Borden
2/6/2018	Maia Goodell	0:48:00	Billable	review communications from expert and opposing counsel re schedule; call with co-counsel re same; plan schedule

2/6/2018	Seth Packrone	0:06:00	Billable	Strategy session with M. Goodell re: NJDOE's duty to monitor and ensure
2/6/2018	Seth Packrone	0:06:00	Billable	Correspond with team re: Casey Z's confidential file and timing for report
2/6/2018	Seth Packrone	0:18:00	Billable	Strategy session with M. Goodell re: further delay for Gagnon's report and plan for upcoming settlement meeting
2/6/2018	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: following up with Gagnon about the deadline
2/6/2018	Seth Packrone	0:18:00	Billable	Tc with team (M. Goodell, J. LoCicero, T. Borden, and C. Bowman) re: timing for Gagnon's report
2/6/2018	Seth Packrone	0:06:00	Billable	Follow up strategy session with M. Goodell re: timing for Gagnon's report and timing of court conference
2/6/2018	Seth Packrone	0:06:00	Billable	Correspond with team and Defendants re: timing for call with expert
2/7/2018	Maia Goodell	0:48:00	Billable	review report re state responsibility for oversight
2/8/2018	Seth Packrone	0:06:00	Billable	Prep for call with Defendants and expert re: deadlines for report
2/8/2018	Seth Packrone	0:18:00	Billable	Tc with Defendants and Dr. Gagnon re: next steps for report and expert discovery (with T. Borden, J. LoCicero, and C. Bowman)
2/8/2018	Seth Packrone	0:30:00	Billable	Draft letter to extend deadlines
2/8/2018	Seth Packrone	0:12:00	Billable	Revise/edit letter to court
2/8/2018	Seth Packrone	0:06:00	Billable	Correspond with J. LoCicero edits/finalizing letter
2/9/2018	Seth Packrone	0:06:00	Billable	Correspond with Defendnats and team re: next steps for order and T. Borden's schedule
2/12/2018	Maia Goodell	0:06:00	Billable	review court order and draft consent order re adjournment
2/12/2018	Seth Packrone	0:24:00	Billable	Draft consent order
2/12/2018	Seth Packrone	0:06:00	Billable	Revise/edit consent order
2/12/2018	Seth Packrone	0:06:00	Billable	Send consent order to team requesting feedback/correspond about edits
2/12/2018	Seth Packrone	0:06:00	Billable	Edit and send consent order to Defendants
2/13/2018	Seth Packrone	0:12:00	Billable	Correspnd with J. LoCicero re: this week's meeting/items to discuss
2/16/2018	Seth Packrone	0:12:00	Billable	Check in with M. Goodell re: plan for settlement conference
2/20/2018	Seth Packrone	0:06:00	Billable	Follow up with J. LoCicero re: status of meeting w co-counsel
2/20/2018	Seth Packrone	0:12:00	Billable	Update Arc of NJ (client) re: timeline for schedule for expert process
2/20/2018	Seth Packrone	0:06:00	Billable	Correspond with J. Locicero re; plan for meeting/status of doc review
2/20/2018	Seth Packrone	0:12:00	Billable	Follow up with team/C. Bowman re: status of meeting and doc review
2/20/2018	Seth Packrone	0:06:00	Billable	Correspond with Arc of NJ re: timeline for expert report and status of report
2/20/2018	Seth Packrone	0:06:00	Billable	follow up with C. Bowman re; doc review status
2/22/2018	Seth Packrone	0:06:00	Billable	follow up with team re: status of Casey Z's educational file
2/22/2018	Seth Packrone	0:06:00	Billable	Tc with J. LoCicero re: next steps in case, status of expert report
2/22/2018	Seth Packrone	0:30:00	Billable	Draft/prep update letters for clients (Brian Y. and Casey Z.)
2/22/2018	Seth Packrone	0:06:00	Billable	Give J. Mukherjee directson re: update letters for clients and attachment
2/22/2018	Seth Packrone	0:06:00	Billable	Contact client (Adam X.) to update him on case
2/22/2018	Seth Packrone	0:06:00	Billable	Draft letter for Adam X. (update letter with court order attached)
2/23/2018	Seth Packrone	0:24:00	Billable	Update client Arc of NJ re: status of case and next steps
2/23/2018	Seth Packrone	0:06:00	Billable	Correspond with J. Locicero re: update on client communications
2/26/2018	Seth Packrone	0:06:00	Billable	Tc with client re: update on case
2/27/2018	Seth Packrone	0:06:00	Billable	Follow up with client re: status of case
2/27/2018	Seth Packrone	0:06:00	Billable	Finalize letter to client and give instructions to J. Mukherjee re: sending letter
2/28/2018	Seth Packrone	0:12:00	Billable	Draft agenda for call with team and correspond with team re: same

3/1/2018	Seth Packrone	0:12:00	Billable	Team call (J. Locicero, E. Huertas, P. Leahy, and C. Bowman and T. Borden) re: update on case and status of expert report
3/1/2018	Seth Packrone	0:12:00	Billable	Correspond with J. LoCicero re: status of expert report
3/7/2018	Seth Packrone	0:06:00	Billable	Correspond with M. Caiola re: final report from expert
3/7/2018	Seth Packrone	0:12:00	Billable	Review final report from expert in Adam X.
3/8/2018	Maia Goodell	0:36:00	Billable	communications with co-counsel re expert report, settlement
3/8/2018	Maia Goodell	0:30:00	Billable	review expert report
3/10/2018	Maia Goodell	2:12:00	Billable	review Dr. Gagnon report
3/12/2018	Maia Goodell	0:12:00	Billable	review prior correspondence re expert fees
3/12/2018	Maia Goodell	0:24:00	Billable	communications with co-counsel re expert report and fees
3/12/2018	Seth Packrone	0:06:00	Billable	Review correspondence with MG and team re: expert fees
3/13/2018	Maia Goodell	0:18:00	Billable	analysis of expert report w S. Packrone and settlement steps
3/13/2018	Michelle Caiola	0:12:00	Billable	update from SP re expert result and settlement strategy
3/13/2018	Seth Packrone	0:18:00	Billable	Strategy session with M. Goodell re: status of expert report and next steps for case
3/13/2018	Seth Packrone	0:12:00	Billable	Review emails between parties and expert
3/13/2018	Seth Packrone	0:12:00	Billable	Check in with M. Caiola re: expert report and next steps
3/13/2018	Seth Packrone	1:18:00	Billable	Review/analyze/take notes on expert report
3/14/2018	Seth Packrone	0:24:00	Billable	Tc with T. Borden re: thoughts on expert and next steps for case
3/14/2018	Seth Packrone	0:06:00	Billable	Correspond with M. Goodell re: potential use of SNA
3/15/2018	Maia Goodell	0:48:00	Billable	call with co-counsel re expert report, settlement
3/15/2018	Michelle Caiola	0:06:00	Billable	update from SP
3/15/2018	Seth Packrone	0:42:00	Billable	Team call with M. Goodell, J. LoCicero, T. Borden, P. Leahy, and C. Bowman re: expert report and next steps
3/15/2018	Seth Packrone	0:12:00	Billable	Check in with M. Goodell re: next steps for settlement negotiations
3/15/2018	Seth Packrone	0:06:00	Billable	Review call notes from last week to get up to speed with team
3/15/2018	Seth Packrone	0:12:00	Billable	Review notes on Gagnon report and potential items for follow up
3/19/2018	Seth Packrone	0:06:00	Billable	Correspond with team re: plan for upcoming call
3/19/2018	Seth Packrone	0:12:00	Billable	Correspond with external consultant re: call
3/19/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: plan for call tomorrow and communications with client
3/19/2018	Seth Packrone	0:12:00	Billable	Correspond with team re: plan for meeting and drafting agenda and sending it
3/19/2018	Seth Packrone	0:18:00	Billable	Draft outlien for potential SNA in Adam X.
3/19/2018	Seth Packrone	0:06:00	Billable	Correspond with M. Caiola, M. Goodell re: potential plan for SNA
3/20/2018	Maia Goodell	0:30:00	Billable	review potential structured negotiation agreement outline; draft potential court order request
3/20/2018	Maia Goodell	0:42:00	Billable	planning re settlement with co-counsel; strategy re potential court order w P. Leahy and S. Packrone
3/20/2018	Seth Packrone	0:12:00	Billable	Review confidentiality order re: sharing report
3/20/2018	Seth Packrone	0:18:00	Billable	Draft summary of confidentiality order and questions for team re: same
3/20/2018	Seth Packrone	0:12:00	Billable	Review other potential model settlements
3/20/2018	Seth Packrone	0:42:00	Billable	Team call (J. Locicero, E. Huertas, P. Leahy, and C. Bowman, M. Goodell and T. Borden) re: update on case and plan for Monday's call with court
3/20/2018	Seth Packrone	0:18:00	Billable	Strategy session with M. Goodell re: next steps for call with court and edits to term sheet
3/20/2018	Seth Packrone	0:06:00	Billable	Correspond with Ds re: expert attending calling with Court
3/20/2018	Seth Packrone	0:06:00	Billable	Review and correspodn with J. LoCicero re: language for consultant agreement

3/21/2018	Maia Goodell	0:12:00	Billable	review communications re settlement strategy, consulting expert
3/21/2018	Michelle Caiola	0:12:00	Billable	review SNA outstanding issues
3/21/2018	Seth Packrone	0:48:00	Billable	Draft memo for team review re: potential settlement terms/formats
3/21/2018	Seth Packrone	0:06:00	Billable	Correspond with ACLU re: plan for internal settlement meeting and meeting with defendants
3/21/2018	Seth Packrone	0:06:00	Billable	Correspond with Ds re: upcoming meetings and tc with court
3/22/2018	Seth Packrone	0:06:00	Billable	Correspond with Ds and expert re: conference
3/22/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: updating clients
3/25/2018	Seth Packrone	0:12:00	Billable	review talking points for call with court and correspond with team re: same
3/25/2018	Seth Packrone	0:06:00	Billable	Correspond with M. Goodell re: talking points for conference with court
3/26/2018	Maia Goodell	0:18:00	Billable	analysis of confidentiality of expert report
3/26/2018	Maia Goodell	0:12:00	Billable	call with court re settlement
3/26/2018	Maia Goodell	0:06:00	Billable	prep for court call
3/26/2018	Michelle Caiola	0:18:00	Billable	update re status of overall legal issues/settlement options
3/26/2018	Seth Packrone	0:12:00	Billable	Check in with M. Goodell re: plan for call with court today and status of report
3/26/2018	Seth Packrone	0:12:00	Billable	Update M. Caiola re: status of case
3/26/2018	Seth Packrone	0:06:00	Billable	Correspond with external consultant re: call
3/26/2018	Seth Packrone	0:12:00	Billable	Tc with J. LoCicero re: plan for call with court and confidentiality
3/26/2018	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: plan for call with court
3/26/2018	Seth Packrone	1:00:00	Billable	Tc with external consultant re: serving as consulting expert in case
3/26/2018	Seth Packrone	0:12:00	Billable	Tc with Ds and judge (J. LoCicero, T. Borden, M. Goodell, and B. Silverman) re: external consultant
3/26/2018	Seth Packrone	0:12:00	Billable	Follow up strategy session with M. Goodell re: next steps in case
3/26/2018	Seth Packrone	0:06:00	Billable	Correspond with external consultant re: confidentiality agreement
3/26/2018	Seth Packrone	0:06:00	Billable	Correspond with team re: next steps with consulting expert
3/27/2018	Seth Packrone	0:12:00	Billable	Correspond with external consultant re: complaint and report and questions to answer
3/27/2018	Seth Packrone	0:06:00	Billable	Correspond with M. Caiola and ACLU-NJ re: next steps for expert consultant
3/27/2018	Seth Packrone	0:06:00	Billable	Review new documents for Casey Z. from Defendants
3/28/2018	Maia Goodell	0:24:00	Billable	analysis of consulting expert information
3/28/2018	Seth Packrone	0:18:00	Billable	Strategy session with M. Goodell re: call with external consultant and next steps for consulting work
3/29/2018	Seth Packrone	0:06:00	Billable	Tc with T. Borden re: status of updating clients
3/29/2018	Seth Packrone	0:06:00	Billable	Check in with M. Goodell and P. Leahy re: next steps for case
3/29/2018	Seth Packrone	0:06:00	Billable	Tc and correspond with client, Arc of NJ, re: update on case
4/2/2018	Maia Goodell	0:30:00	Billable	review settlement correspondence and documents for meeting with co-counsel re settlement proposal
4/2/2018	Maia Goodell	0:30:00	Billable	travel from DRA to ACLU-NJ for meeting with co-counsel re settlement proposal (total was 1 hour; bill half)
4/2/2018	Maia Goodell	3:00:00	Billable	analysis and preparation of settlement proposal with co-counsel
4/2/2018	Maia Goodell	0:12:00	Billable	plan next steps for settlement proposal
4/2/2018	Seth Packrone	0:06:00	Billable	Prep/review expert report for call to update client
4/2/2018	Seth Packrone	0:30:00	Billable	Tc with client, Arc of NJ, re: update on case with T. Borden
4/2/2018	Seth Packrone	0:18:00	Billable	Prep call with T. Borden re: plan for team settlement meeting and update on expert consultant
4/2/2018	Seth Packrone	0:18:00	Billable	Travel to meeting with ACLU-NJ and Proskauer re: settlement strategy (40 minutes in total, bill half and exclude half)

4/2/2018	Seth Packrone	2:54:00	Billable	Meeting with ACLU-NJ (T. Borden, J. LoCicero, and E. Huertas), Proskauer Rose (C. Bowman and B. Silverman), and M. Goodell re: settlement strategy
4/2/2018	Seth Packrone	0:06:00	Billable	Follow up strategy session re: next steps with T. Borden, J. Locicero, E. Huertas, and M. Goodell re: timing for settlement proposal and legal research
4/2/2018	Seth Packrone	0:18:00	Billable	Prep for team strategy session by reviewing settlement proposals up to this point and drafting notes for meeting (re: specific issues to raise in demand sent to Defendants)
4/2/2018	Seth Packrone	0:12:00	Billable	Review other settlements for how the PLRA issue was handled
4/3/2018	Maia Goodell	0:12:00	Billable	plan for settlement letter
4/3/2018	Michelle Caiola	0:12:00	Billable	strategy session with SP re class cert and class reps
4/3/2018	Seth Packrone	0:06:00	Billable	Strategy session with M. Goodell re: PLRA compliance
4/3/2018	Seth Packrone	0:06:00	Billable	Begin to draft settlement proposal to send to Defendants
4/3/2018	Seth Packrone	0:06:00	Billable	Correspond with F. Pitts and T. Zito re: PLRA compliance in prison settlements
4/3/2018	Seth Packrone	0:54:00	Billable	Complete first draft of letter to Defendants with settlement proposal per court order
4/3/2018	Seth Packrone	0:24:00	Billable	Revise letter to Ds with settlement proposal per yesterday's notes
4/3/2018	Seth Packrone	0:06:00	Billable	Tc with T. Borden re: plan for drafting settlement letter for Ds
4/3/2018	Seth Packrone	0:54:00	Billable	Tc with F. Pitts and T. Zito re: PLRA implications for settlement and class cert issues
4/3/2018	Seth Packrone	0:12:00	Billable	Strategy session with M. Caiola re: update on next steps in case
4/3/2018	Seth Packrone	0:18:00	Billable	Update P. Leahy re: co-counsel team meeting and next steps and potential legal research needed
4/4/2018	Maia Goodell	0:24:00	Billable	review and supplement proposed settlement letter
4/4/2018	Seth Packrone	0:06:00	Billable	Revised first draft of settlement letter
4/4/2018	Seth Packrone	0:06:00	Billable	Send letter to T. Borden for her feedback
4/4/2018	Seth Packrone	0:24:00	Billable	Strategy session with M. Goodell re: strategy for settlement letter
4/4/2018	Seth Packrone	0:24:00	Billable	Tc with T. Borden re: edits to letter to defendants
4/4/2018	Seth Packrone	0:06:00	Billable	Tc with T. Borden re: following up about letter to Ds
4/4/2018	Seth Packrone	0:06:00	Billable	Follow up with expert consultant re: status of review of report
4/4/2018	Seth Packrone	0:18:00	Billable	Edit letter to Ds based on T. Borden's feedback
4/4/2018	Seth Packrone	0:06:00	Billable	Correspond with team re: draft of letter to Ds and next steps
4/6/2018	Maia Goodell	1:00:00	Billable	review and supplement proposed settlement letter w S. Packrone
4/6/2018	Michelle Caiola	0:12:00	Billable	t/c with S. Seaborn re standing for class reps
4/6/2018	Michelle Caiola	0:12:00	Billable	update SP re standing for class reps
4/6/2018	Seth Packrone	1:00:00	Billable	Work session with M. Goodell to edit settlement demand
4/6/2018	Seth Packrone	0:06:00	Billable	Review J. LoCicero's edits to settlement demand
4/7/2018	Maia Goodell	0:36:00	Billable	draft analysis of proposed settlement letter for co-counsel
4/7/2018	Seth Packrone	0:06:00	Billable	Review settlement demand and correspond with M. Goodell re: same
4/9/2018	Michelle Caiola	0:18:00	Billable	update from SP re settlement, review agreement
4/9/2018	Seth Packrone	0:12:00	Billable	Review final letter and check in with M. Goodell re: outstanding details
4/9/2018	Seth Packrone	0:06:00	Billable	Review final settlement letter and follow up with M. Caiola re: same
4/10/2018	Seth Packrone	0:06:00	Billable	Follow up with external consultant re: status of analysis of expert report
4/13/2018	Michelle Caiola	0:12:00	Billable	review external consultant's report on expert report
4/13/2018	Michelle Caiola	0:12:00	Billable	confer with SP re external consultant's report on expert report
4/13/2018	Michelle Caiola	0:06:00	Billable	update from SP re settlement positions
4/13/2018	Seth Packrone	0:24:00	Billable	Review/analyze/take notes on expert consultant report on expert report

4/13/2018	Seth Packrone	0:12:00	Billable	Correspond with expert consultant re: review of the report
4/13/2018	Seth Packrone	0:18:00	Billable	Send analysis of expert report to team with notes for next steps
4/13/2018	Seth Packrone	0:12:00	Billable	Check in with M. Caiola re: expert consultant report
4/13/2018	Seth Packrone	0:18:00	Billable	Tc with T. Borden re: next steps for expert consultant, client visits, and legal research
4/13/2018	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: next steps for expert consultant
4/13/2018	Seth Packrone	0:06:00	Billable	Check in with M. Caiola re: follow up with expert consultant
4/17/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: client visits and team meeting
4/17/2018	Seth Packrone	0:06:00	Billable	Correspond with team re: this week's meeting and relevant updates
4/17/2018	Seth Packrone	0:06:00	Billable	Follow up with consulting expert re: any follow up questions on his memo
4/25/2018	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: status of tomorrow's meeting and legal research
4/25/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: plans for Friday's client meetings
4/25/2018	Seth Packrone	0:06:00	Billable	Correspond with team re: meeting this week and relevant updates
4/26/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: plans for client meetings
4/26/2018	Seth Packrone	0:06:00	Billable	Prep for client meetings tomorrow
4/27/2018	Seth Packrone	1:24:00	Billable	Travel to and from home to DOC facilities (total was 165 minutes, bill half)
4/27/2018	Seth Packrone	1:00:00	Billable	Client visit with Brian Y. re: update on status of case and next steps
4/27/2018	Seth Packrone	0:54:00	Billable	Wait at DOC facility for client visit with Casey Z.
4/27/2018	Seth Packrone	1:36:00	Billable	Client visit with Casey Z. re: update on case and steps
4/27/2018	Seth Packrone	0:30:00	Billable	Wait to be processed out of DOC facility after visit with Casey Z.
4/30/2018	Michelle Caiola	0:06:00	Billable	update from SP re timeline and next steps
4/30/2018	Seth Packrone	0:06:00	Billable	Update M. Caiola re: status of settlement negotiations
5/2/2018	Seth Packrone	0:12:00	Billable	Draft weekly agenda and correspond with team re: same
5/2/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: update on client and plan for call this week
5/3/2018	Maia Goodell	0:18:00	Billable	analysis of consulting expert report and case updates with co-counsel
5/3/2018	Seth Packrone	0:24:00	Billable	Review external consultant's memo on expert report
5/3/2018	Seth Packrone	0:18:00	Billable	Team meeting with M. Goodell, P. Leahy, T. Borden, J. LoCicero, B. Silverman, and C. Bowman re: external consultant's report
5/4/2018	Seth Packrone	0:06:00	Billable	Correspond with team re: next week's team call
5/7/2018	Seth Packrone	0:06:00	Billable	Review sources from PLRA compliant settlements
5/11/2018	Seth Packrone	0:06:00	Billable	Review letter from Ds re: extension request
5/11/2018	Seth Packrone	0:12:00	Billable	Strategy session with M. Goodell re: responding to Ds letter
5/11/2018	Seth Packrone	0:06:00	Billable	Tc with ACLU re: plan to call Ds about the extension request
5/11/2018	Seth Packrone	0:06:00	Billable	Tc with opposing counsel re: letter to court and interim response
5/11/2018	Seth Packrone	0:06:00	Billable	Follow up tc with J. LoCicero re: options for responding to Ds letter
5/11/2018	Seth Packrone	0:12:00	Billable	Update M. Goodell re: call with Ds
5/11/2018	Seth Packrone	0:12:00	Billable	Update team re: call with Ds and options moving forward
5/13/2018	Seth Packrone	0:06:00	Billable	Correspond with co-counsel re: contacting court about Ds last minute request for extension
5/14/2018	Michelle Caiola	0:12:00	Billable	update from SP re def's request for time, response
5/14/2018	Seth Packrone	0:12:00	Billable	Update M. Caiola re: plan for responding to Ds request for an extension
5/15/2018	Maia Goodell	0:18:00	Billable	communication with co-counsel re response to defendant extension request

5/15/2018	Maia Goodell	0:12:00	Billable	supplement letter to court re response to defendant extension request
5/15/2018	Michelle Caiola	0:06:00	Billable	update SW re ext request
5/15/2018	Michelle Caiola	0:18:00	Billable	review letter to oppose extension, provide SP edits, review final
5/15/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden and M. Goodell re: status of letter to court about extension
5/15/2018	Seth Packrone	0:06:00	Billable	Review/edit letter to court
5/15/2018	Seth Packrone	0:12:00	Billable	Check in with M. Caiola re: edits to letter to court
5/15/2018	Seth Packrone	0:36:00	Billable	Edit letter to court re: response to extension request and correspond with team re: same
5/15/2018	Seth Packrone	0:06:00	Billable	Tc with team (J. LoCicero, T. Borden, C. Bowman, and M. Goodell) re: responding to Ds' request for an extension
5/16/2018	Seth Packrone	0:18:00	Billable	Tc with client, Brian Y., re: update on his educational situation
5/17/2018	Maia Goodell	0:06:00	Billable	review client retaliation concerns and plan response
5/17/2018	Michelle Caiola	0:06:00	Billable	review court order re ext request
5/17/2018	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: call from client
5/17/2018	Seth Packrone	0:12:00	Billable	Correspond with M. Goodell and team re: plan for meeting, order from court, and rescheduling settlement conference
5/17/2018	Seth Packrone	0:12:00	Billable	Update team re: call with client and follow up with Defendants
5/21/2018	Michelle Caiola	0:06:00	Billable	touch base with SP re next steps
5/21/2018	Seth Packrone	0:06:00	Billable	Correspond with J. LoCicero re: follow up with court about vacated settlement conference
5/22/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: status of co-counsel meeting, status of report on client, and status of deadlines for settlement conference
5/25/2018	Maia Goodell	0:06:00	Billable	review communications re retaliation
5/25/2018	Seth Packrone	0:06:00	Billable	Review correspondence with team and follow up with M. Goodell re: same
5/29/2018	Seth Packrone	0:06:00	Billable	Correspond with team re: follow up with opposing counsel on client issues
5/30/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: follow up about retaliation with opposing counsel and other updates
6/4/2018	Michelle Caiola	0:06:00	Billable	update from SP re pseudonym issue
6/6/2018	Seth Packrone	0:06:00	Billable	Tc with client (Arc of NJ) re: status of case
6/6/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: tomorrow's meeting and other updates
6/6/2018	Seth Packrone	0:24:00	Billable	Tc with client (Arc of NJ) re: status of case
6/6/2018	Seth Packrone	0:12:00	Billable	Correspond with team re: tomorrow's meeting and other updates
6/12/2018	Seth Packrone	0:06:00	Billable	Review T. Borden's update on status of communication about retaliation with opposing counsel and follow up re: same
6/13/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: plan for tomorrow's call
6/14/2018	Seth Packrone	0:12:00	Billable	Tc with Brian Y. re: update on situation
6/14/2018	Seth Packrone	0:36:00	Billable	Tc with team (M. Goodell, P. Leahy, T. Borden, A. Polloni, C. Bowman, J. LoCicero) re: next steps for case
6/14/2018	Seth Packrone	0:06:00	Billable	Follow up strategy session with M. Goodell re: class cert moving forward
6/14/2018	Seth Packrone	0:06:00	Billable	Correspond with P. Leahy re: notes from call
6/18/2018	Seth Packrone	0:06:00	Billable	Correspond with S. Seaborn re: IDEA class cert case law
6/18/2018	Seth Packrone	0:06:00	Billable	Tc with client (Brian Y.) re: update
6/18/2018	Seth Packrone	0:06:00	Billable	Correspond with team re: update on Brian Y
6/18/2018	Seth Packrone	0:06:00	Billable	Send class cert case law to T. Borden re: assignment info to send to Proskauer
6/19/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: update from opposing counsel on Brian Y's educational documents
6/19/2018	Seth Packrone	0:06:00	Billable	Review class cert assignment sent to Proskauer and correspond with T. Borden re: same
6/20/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: status of case and tomorrow's meeting

6/21/2018	Seth Packrone	0:12:00	Billable	Tc with Brian Y. re: update
6/21/2018	Seth Packrone	0:06:00	Billable	Send update on Brian Y. to team
6/27/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re; timing for next meeting based on Ds' response
6/29/2018	Michelle Caiola	0:12:00	Billable	review def response
6/29/2018	Michelle Caiola	0:12:00	Billable	strategy with SP (and MG) re response and next steps
6/29/2018	Seth Packrone	0:30:00	Billable	Review/analyze/draft short memo on Defendants' reponse to our settlement proposal
6/29/2018	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: Ds response to our settlement demand
6/29/2018	Seth Packrone	0:12:00	Billable	Strategy session with M. Caiola and M. Goodell re: Ds response to our settlement demand
7/2/2018	Maia Goodell	0:12:00	Billable	review letter from opposing counsel re settlement
7/2/2018	Maia Goodell	0:30:00	Billable	call with co-counsel, S. Packrone, and P. Leahy re settlement
7/2/2018	Maia Goodell	0:18:00	Billable	analysis of next steps for settlement
7/2/2018	Maia Goodell	0:06:00	Billable	draft communication to opposing counsel re settlement
7/2/2018	Michelle Caiola	0:12:00	Billable	update and strategy with SP re call with P's TRO, litigation or class cert
7/2/2018	Michelle Caiola	0:06:00	Billable	touch base with MG re class cert option
7/2/2018	Seth Packrone	0:36:00	Billable	Tc with M. Goodell, P. Leahy, J. LoCicero, T. Borden, A. Polloni, and C. Bowman re Ds response and next steps
7/2/2018	Seth Packrone	0:12:00	Billable	Check in with M. Goodell re: next steps for Adam X.
7/2/2018	Seth Packrone	0:06:00	Billable	Check in with M. Caiola re: settlement posture and plan for settlement conference
7/2/2018	Seth Packrone	0:12:00	Billable	Review court order appointment Dr. Gagnon as neutral expert and send draft language to M. Goodell
7/2/2018	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: follow up to Defendants
7/3/2018	Seth Packrone	0:06:00	Billable	Prep task list for settlement/research moving forward
7/3/2018	Seth Packrone	0:24:00	Billable	Review status of intakes and determine potential class members to visit
7/3/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: doing intakes prior to settlement conference
7/3/2018	Seth Packrone	0:06:00	Billable	Follow up with T. Borden re: plan for intakes and list of intakes
7/9/2018	Maia Goodell	0:12:00	Billable	analysis and planning for response to defendant position letter
7/9/2018	Michelle Caiola	0:06:00	Billable	review SP email in follow up to settlement positions
7/9/2018	Seth Packrone	0:06:00	Billable	Follow up with T. Borden re; plan for July intakes
7/9/2018	Seth Packrone	0:12:00	Billable	Correspond with T. Borden and A. Polloni re: plan for intakes in July
7/9/2018	Seth Packrone	0:06:00	Billable	Review co-counsel email re: follow up on settlement proposal from Ds
7/9/2018	Seth Packrone	0:18:00	Billable	Strategy session with M. Goodell re: next steps for settlement negotiations
7/9/2018	Seth Packrone	0:18:00	Billable	Draft position on settlement negotiations moving forward and send to M. Goodell for review
7/9/2018	Seth Packrone	0:06:00	Billable	Correspond with M. Caiola re: plan for following up with Defendants about settlement proposal
7/10/2018	Michelle Caiola	0:18:00	Billable	strategy session with SP and direction re response to def letter and positioning for court
7/10/2018	Seth Packrone	0:12:00	Billable	Get instructions from M. Caiola re: following up with Defendants about settlement proposal
7/10/2018	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: next steps for following up with Defendants
7/10/2018	Seth Packrone	0:12:00	Billable	Draft response to Defendants re: their settlement proposal
7/10/2018	Seth Packrone	0:12:00	Billable	Correspond with team re: strategy for responding to Defendants' settlement proposal
7/11/2018	Maia Goodell	0:42:00	Billable	call with co-counsel re response to defendant position statement; plans for ex parte settlement statement
7/11/2018	Seth Packrone	0:06:00	Billable	Correspond with M. Goodell and M. Caiola re: next steps for settlement discussions
7/11/2018	Seth Packrone	0:06:00	Billable	Follow up with J. LoCicero re: responding to Ds and meeting today

7/11/2018	Seth Packrone	0:18:00	Billable	Review Gagnon's report and Ds' settlement response
7/11/2018	Seth Packrone	0:36:00	Billable	Tc with team re: ex parte statement and follow up with Defendants
7/11/2018	Seth Packrone	0:18:00	Billable	Strategy session with M. Goodell re: plan for drafting ex parte statement
7/11/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden, A. Polloni re: upcoming client visits and intakes
7/11/2018	Seth Packrone	0:18:00	Billable	Draft outline and drafting plan for ex parte statement
7/11/2018	Seth Packrone	0:24:00	Billable	Compile list of students for intakes this month
7/11/2018	Seth Packrone	0:12:00	Billable	Review/analyze PLRA research from Proskauer
7/11/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: plan for drafting ex parte statement
7/12/2018	Michelle Caiola	0:12:00	Billable	review new draft letter to def, SP's edits, advise him further re same
7/12/2018	Seth Packrone	0:06:00	Billable	Follow up with T. Borden and M. Goodell re: plan for intakes and ex parte statement
7/12/2018	Seth Packrone	0:06:00	Billable	Review R. Handley's PLRA research memo
7/12/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: breakdown and plan for drafting ex parte statement
7/12/2018	Seth Packrone	0:06:00	Billable	Give J. Mukherjee instructions re: visits at DOC facility
7/12/2018	Seth Packrone	0:06:00	Billable	Correspond with M. Caiola and M. Goodell re: response to Defendants' settlement proposal
7/12/2018	Seth Packrone	0:12:00	Billable	Correspond with team re: issues to confer with Defendants about prior to conference
7/12/2018	Seth Packrone	0:12:00	Billable	Edit letter from Proskauer to Defendants
7/12/2018	Seth Packrone	0:06:00	Billable	Check in with M. Caiola and M. Goodell re: edits to letter to Defendants
7/12/2018	Seth Packrone	0:12:00	Billable	Follow up with team re: plan for letter to Defendants
7/12/2018	Seth Packrone	0:06:00	Billable	Tc with T. Borden re: status of letter to Defendants
7/12/2018	Seth Packrone	0:18:00	Billable	Review case documents to prep to write ex parte statement
7/12/2018	Seth Packrone	0:42:00	Billable	Begin drafting sections of ex parte statement for upcoming settlement conference
7/13/2018	Michelle Caiola	0:12:00	Billable	update and next steps from S. Packrone
7/13/2018	Seth Packrone	0:24:00	Billable	Draft intro to ex parte statement
7/13/2018	Seth Packrone	0:30:00	Billable	Review Gagnon's report and take notes to draft ex parte statement
7/13/2018	Seth Packrone	1:00:00	Billable	Draft section about Gagnon's report in ex parte statement
7/13/2018	Seth Packrone	0:06:00	Billable	Correspond with team re: response letter to Ds about settlement proposal
7/13/2018	Seth Packrone	0:12:00	Billable	Check in with M. Caiola re: settlement strategy moving forward
7/13/2018	Seth Packrone	0:18:00	Billable	Draft section of ex parte statement re: plaintiffs' settlement proposal
7/13/2018	Seth Packrone	1:06:00	Billable	Edit/revise ex parte statement draft
7/13/2018	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: structure of ex parte statement and plan for settlement conference
7/16/2018	Maia Goodell	0:30:00	Billable	review and supplement ex parte settlement statement
7/16/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: next steps for case
7/16/2018	Seth Packrone	0:12:00	Billable	Finish drafting section of ex parte statement about Gagnon's report
7/16/2018	Seth Packrone	0:48:00	Billable	Edit/revise/shorten section of ex parte statement I drafted
7/16/2018	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: scope of ex parte statement
7/16/2018	Seth Packrone	0:12:00	Billable	Review visit request and give K. Anderson instructions re: same
7/16/2018	Seth Packrone	0:30:00	Billable	Edit/shorten ACLU's section of ex parte statement
7/16/2018	Seth Packrone	0:06:00	Billable	Send draft of ex parte statement to M. Goodell with notes about feedback
7/16/2018	Seth Packrone	0:06:00	Billable	Follow up with T. Borden re: next steps for ex parte statement

7/17/2018	Maia Goodell	0:12:00	Billable	strategy analysis for ex parte settlement statement with S.Packrone
7/17/2018	Seth Packrone	0:06:00	Billable	Review M. Goodell's edits to ex parte statement
7/17/2018	Seth Packrone	0:30:00	Billable	Input M. Goodell's edits to ex parte statement draft
7/17/2018	Seth Packrone	0:12:00	Billable	Strategy session with M. Goodell re: edits to ex parte statement
7/17/2018	Seth Packrone	0:30:00	Billable	Edit/revise/shorten complete draft of ex parte statement
7/17/2018	Seth Packrone	0:06:00	Billable	Send ex parte draft to T. Borden for her comments/feedback
7/17/2018	Seth Packrone	0:12:00	Billable	Correspond with K. Anderson and ACLU-NJ re: setting up visits for 7/27/18
7/18/2018	Michelle Caiola	0:12:00	Billable	review letter to court, advise SP re edits
7/18/2018	Seth Packrone	0:12:00	Billable	Work with M. Caiola re: ex parte statement for Adam X.
7/18/2018	Seth Packrone	0:24:00	Billable	Edit ex parte statement and correspond with T. Borden re: same
7/19/2018	Seth Packrone	0:06:00	Billable	Correspond with ACLU re: client visit next week
7/19/2018	Seth Packrone	0:24:00	Billable	Tc with T. Borden, J. LoCicero, C. Bownman, P. Leahy and A. Pollioni re: ex parte statement
7/19/2018	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: plan for August 1 settlement conference
7/19/2018	Seth Packrone	0:06:00	Billable	Check in with K. Anderson re: status of intake request
7/20/2018	Seth Packrone	0:06:00	Billable	Follow up with K. Anderson re: status of intake request
7/23/2018	Michelle Caiola	0:06:00	Billable	review Proskauer edits, advise sp
7/23/2018	Seth Packrone	0:06:00	Billable	Send client, Arc of NJ, an update re: status of case
7/23/2018	Seth Packrone	0:12:00	Billable	Update ACLU/Proskauer re: status of intakes/client visits on Friday
7/23/2018	Seth Packrone	0:06:00	Billable	Correspond with Defense counsel re: plan for Gagnon's participation in settlement conference
7/23/2018	Seth Packrone	0:06:00	Billable	Check in with K. Anderson re: call from DOC facility about Friday's intakes
7/23/2018	Seth Packrone	0:12:00	Billable	Tc with administrator at DOC facility re: status of Friday's intakes
7/23/2018	Seth Packrone	0:12:00	Billable	Review Proskauer's edits to ex parte statement and compare to original document
7/23/2018	Seth Packrone	0:06:00	Billable	Correspond with J. LoCicero re: process for incorporating edits
7/23/2018	Seth Packrone	0:06:00	Billable	Tc with J. LoCicero re: next steps for case
7/24/2018	Seth Packrone	1:00:00	Billable	Edit/revise ex parte statement draft based on edits/comments
7/24/2018	Seth Packrone	0:18:00	Billable	Proofread/shorten ex parte statement to send to J. LoCicero
7/24/2018	Seth Packrone	0:12:00	Billable	Send ex parte statement to J. LoCicero with notes for next steps and edits to this draft
7/24/2018	Seth Packrone	0:06:00	Billable	Follow up with Arc of NJ re: update on case
7/24/2018	Seth Packrone	0:06:00	Billable	Correspond with J. LoCicero re: steps for finalizing ex parte statement
7/24/2018	Seth Packrone	0:06:00	Billable	Review J. LoCicero's edits to ex parte statement
7/24/2018	Seth Packrone	0:06:00	Billable	Check in with M. Bland re: cite checking ex parte statement
7/24/2018	Seth Packrone	0:06:00	Billable	Meeting with M. Bland re: edits to ex parte statement
7/24/2018	Seth Packrone	0:06:00	Billable	Tc with client (Arc of NJ) re: update on case
7/24/2018	Seth Packrone	0:06:00	Billable	Follow up with Dr. Gagnon and Ds re: Gagnon's participation in settlement conference
7/24/2018	Seth Packrone	0:30:00	Billable	Final edits/proofread ex parte statement and send to J. LoCicero to finalize
7/25/2018	Michelle Caiola	0:06:00	Billable	update on final filing of ex parte statement
7/25/2018	Seth Packrone	0:18:00	Billable	Tc with client, Arc of NJ, re: update on case
7/25/2018	Seth Packrone	0:06:00	Billable	Check in with J. LoCicero re: filing ex parte statement and update from client
7/25/2018	Seth Packrone	0:06:00	Billable	Give J. Mukherjee instructions re: creating exhibits for ex parte statement

7/25/2018	Seth Packrone	0:06:00	Billable	Follow up with J. LoCicero re: filing of ex parte statement and finalized exhibits
7/25/2018	Seth Packrone	0:06:00	Billable	Review ex parte statement submitted to court and follow up with client
7/25/2018	Seth Packrone	0:06:00	Billable	Prep for intakes on Friday
7/25/2018	Seth Packrone	0:12:00	Billable	Correspond with A. Pollioni re: plan for intakes on Friday, notes for documents to review
7/26/2018	Seth Packrone	0:06:00	Billable	Compile documents for intakes and client visits
7/26/2018	Seth Packrone	0:12:00	Billable	Compile supporting documents for settlement conference next week
7/26/2018	Seth Packrone	0:06:00	Billable	Correspond with team re: today's call
7/26/2018	Seth Packrone	0:12:00	Billable	Prep docs for intakes/settlement conference
7/27/2018	Seth Packrone	1:48:00	Billable	Travel to and from two DOC facilities and home to conduct intakes and meet with clients (total, 3.7, bill half)
7/27/2018	Seth Packrone	0:36:00	Billable	Wait at DOC facility to visit client, Casey Z., to update him on case
7/27/2018	Seth Packrone	1:06:00	Billable	Visit client, Casey Z., and update him on case
7/27/2018	Seth Packrone	0:42:00	Billable	Update Brian Y. on status of case and next steps
7/27/2018	Seth Packrone	1:48:00	Billable	Conduct three intakes at DOC facility
7/30/2018	Seth Packrone	0:18:00	Billable	Get instructions from M. Caiola re: plan for Wednesday's settlement conference
7/30/2018	Seth Packrone	0:12:00	Billable	Organize case file with documents from Friday's intakes
7/30/2018	Seth Packrone	0:48:00	Billable	Draft talking points and create settlement negotiation chart for settlement conference
7/31/2018	Maia Goodell	0:48:00	Billable	review communications with co-counsel; plan for court settlement conference
7/31/2018	Michelle Caiola	0:06:00	Billable	status update from SP -
7/31/2018	Seth Packrone	0:12:00	Billable	Update M. Goodell re: status of plan for settlement conference
7/31/2018	Seth Packrone	0:12:00	Billable	Update talking points/settlement chart for upcoming settlement conference
7/31/2018	Seth Packrone	0:12:00	Billable	Send talking points, settlement chart, and note on DOE's role in monitoring to J. LoCicero
7/31/2018	Seth Packrone	0:18:00	Billable	Update intakes spreadsheet based on Friday's visits and send T. Borden update on intakes
7/31/2018	Seth Packrone	0:24:00	Billable	Prep documents/logistics for tomorrow's settlement conference
7/31/2018	Seth Packrone	0:36:00	Billable	Strategy session with M. Goodell re: plan for tomorrow's settlement conference
7/31/2018	Seth Packrone	0:06:00	Billable	Correspond with ACLU-NJ and Gagnon re: plan for tomorrow's settlement conference
8/1/2018	Maia Goodell	0:30:00	Billable	travel to Newark for pre-conference prep (total 1 hour; bill half)
8/1/2018	Maia Goodell	0:30:00	Billable	conference with co-counsel re court conference and settlement position
8/1/2018	Maia Goodell	1:36:00	Billable	Meeting with co-counsel to prep for settlement conference (M. Goodell, J. LoCicero, T. Borden, E. Huertas, A. Pollioni, and C. Bowman)
8/1/2018	Maia Goodell	0:30:00	Billable	travel from Newark to Trenton for court settlement conference (total 1 hour; bill half)
8/1/2018	Maia Goodell	0:30:00	Billable	travel from Trenton to NYC following court settlement conference (total 1 hour; bill half)
8/1/2018	Michelle Caiola	0:06:00	Billable	abbreviated update from SP/MG re court conf
8/1/2018	Seth Packrone	0:12:00	Billable	Prep for settlement conference by reviewing talking points/settlement positions
8/1/2018	Seth Packrone	0:12:00	Billable	Travel to Newark for meeting with co-counsel (total was .5, bill half)
8/1/2018	Seth Packrone	1:36:00	Billable	Meeting with co-counsel to prep for settlement conference (M. Goodell, J. LoCicero, T. Borden, E. Huertas, A. Pollioni, and C. Bowman)
8/1/2018	Seth Packrone	0:30:00	Billable	Travel to Trenton from Newark for settlement conference with Defendants (total is 1, bill half)
8/1/2018	Seth Packrone	0:42:00	Billable	Prepare for settlement conference with Judge Goodman and Defendants
8/1/2018	Seth Packrone	1:48:00	Billable	Settlement conference with Judge Goodman and Defendants
8/1/2018	Seth Packrone	0:30:00	Billable	Travel back from Trenton from settlement conference with Judge Goodman (total was 1.1, bill half)
8/2/2018	Maia Goodell	0:12:00	Billable	plan settlement outline with co-counsel, S. Packrone, and P. Leahy

8/2/2018	Maia Goodell	0:12:00	Billable	analysis of settlement conference and strategy for next steps
8/2/2018	Michelle Caiola	0:12:00	Billable	update from SP re settlement conference and next steps -
8/2/2018	Seth Packrone	0:12:00	Billable	Check in with M. Caiola re: next steps after settlement conference with Judge Goodman
8/2/2018	Seth Packrone	0:12:00	Billable	Tc with team (T. Borden, E. Huertas, A. Pollioni, C. Bowman, M. Goodell, and P. Leahy) re: next steps in case
8/2/2018	Seth Packrone	0:06:00	Billable	Follow up with M. Goodell re: results of settlement conference and next steps
8/3/2018	Seth Packrone	0:06:00	Billable	Review R. Handley's case law research and follow up re: same
8/3/2018	Seth Packrone	0:06:00	Billable	Follow up with ACLU re: setting in person meeting with Defendants
8/3/2018	Seth Packrone	0:06:00	Billable	Review intake notes from DOC facility
8/6/2018	Seth Packrone	0:42:00	Billable	Review/take notes/analyze Gagnon report on gen ed and special educaiton interventions to draft demand to send to Ds
8/6/2018	Seth Packrone	0:36:00	Billable	Review/take notes/analyze Gagnon report on transition services, staffing, and oversight to draft demand to send to Ds
8/6/2018	Seth Packrone	0:18:00	Billable	Tc with P. Leahy re: updating him on settlement conference with Judge Goodman and next steps for case
8/6/2018	Seth Packrone	0:48:00	Billable	Review/take notes/analyze Gagnon report individual allegations, appendices, and monitoring to draft demand to send to Ds
8/6/2018	Seth Packrone	0:18:00	Billable	Tc with S. Seaborn re: framing demand to Ds and provisions to leave out
8/6/2018	Seth Packrone	0:06:00	Billable	Review Proskauer's draft of demand for Defendants and correspond with T. Borden re: same
8/7/2018	Maia Goodell	0:12:00	Billable	analysis for demand draft and settlement strategy
8/7/2018	Seth Packrone	0:06:00	Billable	Review/analyze Proskauer draft of issues to send to Defendants
8/7/2018	Seth Packrone	0:24:00	Billable	Tc with T. Borden re: plan for drafting list of issues to send to Defendants
8/7/2018	Seth Packrone	0:12:00	Billable	Check in with M. Goodell re: issues to send to Defendants
8/7/2018	Seth Packrone	0:30:00	Billable	Draft introduction and section on child find of list of issues to send to Defendants
8/7/2018	Seth Packrone	1:06:00	Billable	Draft section of list of issues for Defendants on special education services, including development of IEPs and behavioral services
8/7/2018	Seth Packrone	0:18:00	Billable	Draft section on staffing of proposal for Ds re: scope of corrective action plan
8/7/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden and M. Goodell re: plan for September in-person meeting with Defendants
8/7/2018	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: plan for settlement meeting
8/7/2018	Seth Packrone	0:18:00	Billable	Finish first draft of proposal to Ds re: scope of corrective action plan
8/7/2018	Seth Packrone	0:12:00	Billable	Edit proposal to Ds re: corrective action plan based on A. Pollioni's draft
8/7/2018	Seth Packrone	0:12:00	Billable	Revise first draft of proposal to Ds re: corrective action plan
8/7/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden and Ds re: plan for in-person September meeting
8/7/2018	Seth Packrone	0:12:00	Billable	Send draft of proposal for Ds re: CAP to T. Borden with notes on draft
8/8/2018	Maia Goodell	0:06:00	Billable	plan for settlement meeting
8/8/2018	Michelle Caiola	0:12:00	Billable	report from MG re settlement conference and advise on next steps
8/9/2018	Michelle Caiola	0:18:00	Billable	touch base with S. Packrone re staffing next meeting and edit to submission to def's on outline of settlement
8/9/2018	Michelle Caiola	0:12:00	Billable	review letter to def on settlement, edits
8/9/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden and team re: status of proposal to Ds and today's team call
8/9/2018	Seth Packrone	0:18:00	Billable	Check in with M. Caiola re: plan for September's settlement conference
8/10/2018	Maia Goodell	1:12:00	Billable	review and supplement letter to defendants re settlement demand
8/10/2018	Seth Packrone	0:06:00	Billable	Review ACLU's edits to proposal for Ds and follow up with T. Borden re: same
8/10/2018	Seth Packrone	0:06:00	Billable	Correspond with M. Goodell re: reviewing proposal for Ds and thoughts on additions
8/10/2018	Seth Packrone	0:24:00	Billable	Edit/revise proposal for Defendants based on ACLU's Edits
8/10/2018	Seth Packrone	0:06:00	Billable	Correspond with M. Goodell re: my edits to defendants proposal

8/10/2018	Seth Packrone	0:06:00	Billable	Tc with A. Pollioni re; upcoming deadlines in case
8/10/2018	Seth Packrone	0:24:00	Billable	Strategy session with M. Goodell re: edits to proposal to Defendants and next steps
8/13/2018	Maia Goodell	0:12:00	Billable	review of co-counsel comments on remedy demand outline with S.Packrone
8/13/2018	Seth Packrone	0:06:00	Billable	Review M. Goodell's comments/edits to settlement demand and correspond with T. Borden re: same
8/13/2018	Seth Packrone	0:36:00	Billable	Tc with T. Borden re: edits to proposal for Defendants
8/13/2018	Seth Packrone	0:12:00	Billable	Strategy session with M. Goodell re: edits to proposal to Defendants and plan for finalizing
8/13/2018	Seth Packrone	0:42:00	Billable	Edit proposal for Ds based on tc with T. Borden
8/13/2018	Seth Packrone	0:06:00	Billable	Send revised proposal to T. Borden with notes for finalizing
8/14/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: process for finalizing the proposal to send to Defendants
8/14/2018	Seth Packrone	0:06:00	Billable	Edit final proposal to defendants and correspond with T. Borden re: same
8/15/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: plan for finalizing proposal to Ds
8/16/2018	Seth Packrone	0:18:00	Billable	Edit/proofread proposal to Defendants
8/16/2018	Seth Packrone	0:06:00	Billable	Review Gagnon's report for wording in proposal to Ds
8/16/2018	Seth Packrone	0:06:00	Billable	Send final proposal to Ds to team
8/16/2018	Seth Packrone	0:06:00	Billable	Send proposal to Defendants and follow up with team
8/16/2018	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: client records and regulations on manifestation determinations in prisons
8/29/2018	Seth Packrone	0:06:00	Billable	Correspond with client, Arc of NJ, re: update on settlement negotiations
9/4/2018	Seth Packrone	0:06:00	Billable	Correspond with M. Goodell re: next steps for settlement negotiations
9/4/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: follow up with Defendants
9/5/2018	Seth Packrone	0:12:00	Billable	Correspond with T. Borden and Ds re: timing for in-person meeting
9/7/2018	Seth Packrone	0:06:00	Billable	Correspond with team re: meeting with Defendants
9/7/2018	Seth Packrone	0:30:00	Billable	Tc with client from Arc of NJ re: update on case
9/7/2018	Seth Packrone	0:06:00	Billable	Correspond with client (Arc of NJ) re: update on case
9/10/2018	Seth Packrone	0:06:00	Billable	Follow up with T. Borden re: plan for in-person meeting with Defendants
9/13/2018	Seth Packrone	0:06:00	Billable	Correspond with team re: time for next meeting
9/17/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: Ds failure to respond today
9/18/2018	Maia Goodell	0:12:00	Billable	review defendant response to settlement proposal
9/18/2018	Maia Goodell	0:30:00	Billable	call with co-counsel re defendant response and plan for upcoming settlement meeting w P. Leahy and S. Packrone
9/18/2018	Michelle Caiola	0:12:00	Billable	update from SP re response by Def and next steps
9/18/2018	Seth Packrone	0:06:00	Billable	Review Defendants' response to our settlement proposal
9/18/2018	Seth Packrone	0:06:00	Billable	Correspond with DRA team re: Defendants' response to our settlement proposal
9/18/2018	Seth Packrone	0:30:00	Billable	Team call (T. Borden, M. Goodell, J. LoCicero, P. Leahy, A. Pollioni, C. Bowman, and E. Huertas) re: next steps for settlement conference
9/18/2018	Seth Packrone	0:12:00	Billable	Review Ds settlement response and prep for team call
9/18/2018	Seth Packrone	0:06:00	Billable	Correspond with ACLU re: Gagnon's email
9/18/2018	Seth Packrone	0:06:00	Billable	Follow up with ACLU re; plan for settlement chart
9/19/2018	Maia Goodell	0:42:00	Billable	review and draft supplement to settlement chart
9/19/2018	Seth Packrone	0:06:00	Billable	Correspond with ACLU re: follow up with Gagnon
9/19/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: negotiation plan for Friday's settlement conference
9/19/2018	Seth Packrone	0:12:00	Billable	Prep settlement chart for Friday

9/19/2018	Seth Packrone	0:06:00	Billable	Give R. Moser instructions re: prepping settlement chart
9/19/2018	Seth Packrone	0:06:00	Billable	Review/edit settlement chart to send to T. Borden
9/19/2018	Seth Packrone	0:24:00	Billable	Tc with T. Borden re: plan for Friday's settlement conference and settlement chart
9/19/2018	Seth Packrone	0:12:00	Billable	Edit chart based on T. Borden's feedback
9/19/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: settlement chart for Friday
9/19/2018	Seth Packrone	0:06:00	Billable	Correspond with M. Goodell re: plan for Friday's settlement conference
9/19/2018	Seth Packrone	0:12:00	Billable	Tc with Brian Y. re: update on case
9/20/2018	Maia Goodell	0:18:00	Billable	review and supplement settlement chart with S.Packrone
9/20/2018	Seth Packrone	0:12:00	Billable	Correspond with M. Goodell re: her thoughts/edits to chart for settlement conference
9/20/2018	Seth Packrone	0:18:00	Billable	Prep for settlement conference with Defendants
9/20/2018	Seth Packrone	0:18:00	Billable	Get M. Goodell's feedback on settlement chart and thoughts for Friday's settlement conference
9/20/2018	Seth Packrone	0:12:00	Billable	Correspond with team re: issues list for Friday's settlement conference
9/21/2018	Seth Packrone	0:06:00	Billable	Follow up with T. Borden re: plan for settlement conference today
9/21/2018	Seth Packrone	0:42:00	Billable	Travel from home to Trenton Justice Complex to meet with Defendants for settlement conference (total 1.5, bill half)
9/21/2018	Seth Packrone	0:30:00	Billable	Prep for settlement conference re: reviewing case documents and settlement chart with positions
9/21/2018	Seth Packrone	2:42:00	Billable	Settlement conference with Defendants and A. Pollioni, T. Borden, J. LoCicero, and C. Bowman (by phone)
9/21/2018	Seth Packrone	0:42:00	Billable	Travel from Trenton Justice Complex back to home (Total was 1.5, bill half)
9/21/2018	Seth Packrone	0:12:00	Billable	Update team re: results of settlement conference
9/24/2018	Seth Packrone	0:12:00	Billable	Correspond with Dr. Gagnon and Defendants re: further services needed
9/24/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: plan for call with court and issues arising out of settlement conference
9/25/2018	Maia Goodell	0:18:00	Billable	review and supplement plan for court conference with S.Packrone
9/25/2018	Maia Goodell	0:18:00	Billable	review report re court conference
9/25/2018	Seth Packrone	0:12:00	Billable	Draft talking points for court conference and share with T. Borden
9/25/2018	Seth Packrone	0:18:00	Billable	Tc with M. Goodell re: plan for conference with Judge Goodman
9/25/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: consent order for meetings
9/25/2018	Seth Packrone	0:12:00	Billable	Prep for call with Court
9/25/2018	Seth Packrone	0:24:00	Billable	Call with Ds and Court (Judge Wolfson and Judge Goodman) re: update on settlement negotiations and scheduling the next meeting
9/25/2018	Seth Packrone	0:18:00	Billable	Follow up tc with T. Borden, J. LoCicero, and A. Pollioni re: next steps for negotiations
9/25/2018	Seth Packrone	0:06:00	Billable	Update team re: results of court conference
9/25/2018	Seth Packrone	0:06:00	Billable	Update client, Arc of NJ, re: status of settlement negotiations
9/26/2018	Maia Goodell	0:48:00	Billable	analysis of defendant settlement position and plan strategy re potential areas of dispute in strategy session with S. Packrone
9/26/2018	Seth Packrone	0:48:00	Billable	Strategy session with M. Goodell re: Ps' settlement positions heading into next settlement conference
9/26/2018	Seth Packrone	0:06:00	Billable	Correspond with client re: upcoming meeting and Oct. 22 settlement conference
9/27/2018	Maia Goodell	0:24:00	Billable	call with co-counsel re next steps following court conference with P. Leahy and S. Packrone
9/27/2018	Maia Goodell	0:06:00	Billable	strategy for potential expert analysis of staffing issues and other defendant objections
9/27/2018	Seth Packrone	0:06:00	Billable	Correspond with team re: finalizing plan for next meeting with Defendants
9/27/2018	Seth Packrone	0:24:00	Billable	Tc with M. Goodell, T. Borden, A. Pollioni, C. Bowman, and P. Leahy re: next steps for settlement negotiations
9/27/2018	Seth Packrone	0:06:00	Billable	Follow up strategy session with M. Goodell re: union issues with settlement
9/27/2018	Seth Packrone	0:06:00	Billable	Tc with P. Leahy re: research into other settlement agreements

9/28/2018	Seth Packrone	0:06:00	Billable	Follow up with T. Borden and M. Goodell re: next steps for settlement negotiations
9/28/2018	Seth Packrone	0:06:00	Billable	Correspond with external consultant re: follow up on certain substantive issues
10/1/2018	Seth Packrone	0:12:00	Billable	Tc with P. Leahy re: update on review of settlements and provisions to include in eventual settlement agreement
10/1/2018	Seth Packrone	0:12:00	Billable	Review Buckley settlement for helpful provisions to include in Adam X. negotiations
10/2/2018	Michelle Caiola	0:06:00	Billable	status update from SP
10/2/2018	Seth Packrone	0:12:00	Billable	Correspond with external consultant re: checking in about substantive issues in prisons
10/2/2018	Seth Packrone	0:12:00	Billable	Correspond with ACLU re: plan for calls with clients
10/2/2018	Seth Packrone	0:30:00	Billable	Update client, Arc of NJ, re: next steps for settlement discussions
10/2/2018	Seth Packrone	0:06:00	Billable	Update M. Caiola on status of case and next steps
10/2/2018	Seth Packrone	0:06:00	Billable	Follow up with P. Leahy re: states to look for best practices
10/3/2018	Seth Packrone	0:06:00	Billable	Correspond with ACLU re: plan for research on outstanding settlement issues
10/4/2018	Seth Packrone	0:12:00	Billable	Review settlement in Garcia and take notes
10/4/2018	Seth Packrone	0:06:00	Billable	Correspond with S. Seaborn, M. Goodell, and P. Leahy re: substantive settlement provisions
10/4/2018	Seth Packrone	0:12:00	Billable	Review P. Leahy's research on other settlements to inform negotiations moving forward
10/4/2018	Seth Packrone	0:06:00	Billable	Correspond with J. LoCicero and C. Bowman re: notes from 9.21.18 settlement conference
10/4/2018	Seth Packrone	0:12:00	Billable	Tc with S. Seaborn re: Garcia settlement's provisions
10/4/2018	Seth Packrone	0:06:00	Billable	Tc with A. Rogers and J. LoCicero re: status of calls with plaintiffs
10/4/2018	Seth Packrone	0:06:00	Billable	Update M. Goodell re: status of settlement research
10/4/2018	Seth Packrone	0:06:00	Billable	Correspond with Garcia team re: discussing settlement
10/4/2018	Seth Packrone	0:12:00	Billable	Prep for settlement conference with Defendants
10/4/2018	Seth Packrone	1:12:00	Billable	Settlement conference over the phone with Defendants with C. Bowman and J. LoCicero
10/4/2018	Seth Packrone	0:24:00	Billable	Follow up strategy session with J. LoCicero and C. Bowman re: next steps after settlement conference
10/4/2018	Seth Packrone	0:12:00	Billable	Update M. Goodell re: results of settlement conference
10/4/2018	Seth Packrone	0:18:00	Billable	Tc with P. Leahy re: next steps for research
10/5/2018	Seth Packrone	0:12:00	Billable	Review best practices report on education in correctional facilities for substantive settlement terms
10/5/2018	Seth Packrone	0:18:00	Billable	Review Ohio DOC education policies for substantive settlement terms
10/5/2018	Seth Packrone	0:06:00	Billable	Tc with P. Leahy re: follow up research on Ohio DOC education policies
10/5/2018	Seth Packrone	0:06:00	Billable	Correspond with team re: update on settlement research
10/5/2018	Seth Packrone	0:06:00	Billable	Correspond with client re: settlement issues
10/5/2018	Seth Packrone	0:06:00	Billable	Tc with client (rep from Arc of NJ) re: settlement issues
10/9/2018	Seth Packrone	0:06:00	Billable	Review background of potential monitor sent by ACLU
10/9/2018	Seth Packrone	0:12:00	Billable	Correspond with ACLU re: potential monitor and complaint from NJDOC teacher
10/9/2018	Seth Packrone	0:06:00	Billable	Correspond with P. Leahy re: next steps for settlement research
10/11/2018	Maia Goodell	0:36:00	Billable	call with co-counsel, S. Packrone, and P. Leahy re response to DOC concerns raised in settlement meetings
10/11/2018	Seth Packrone	0:06:00	Billable	Prep for client calls
10/11/2018	Seth Packrone	0:06:00	Billable	Tc with DOC facility for client call
10/11/2018	Seth Packrone	0:06:00	Billable	Follow up with ACLU and team re: call with client
10/11/2018	Seth Packrone	0:12:00	Billable	Draft agenda for team call with next steps for settlement
10/11/2018	Seth Packrone	0:06:00	Billable	Correspond with P. Leahy re: other states' special education policies/procedures

10/11/2018	Seth Packrone	0:30:00	Billable	Tc with Brian Y. re: settlement proposal and next steps
10/11/2018	Seth Packrone	0:12:00	Billable	Tc with P. Leahy re: next steps for research on states/settlement proposals
10/11/2018	Seth Packrone	0:36:00	Billable	Tc with M. Goodell, T. Borden, P. Leahy, J. LoCicero, and A. Pollioni re: next steps for settlement conference
10/11/2018	Seth Packrone	0:12:00	Billable	Get instructions from M. Goodell re: drafting settlement letter
10/11/2018	Seth Packrone	0:30:00	Billable	Draft first draft of settlement update letter to send to Defendants
10/11/2018	Seth Packrone	0:18:00	Billable	Revise/edit first draft of settlement letter to Defendants and send to M. Goodell with request for feedback
10/12/2018	Maia Goodell	0:18:00	Billable	review and supplement letter to defendants re settlement
10/12/2018	Maia Goodell	0:06:00	Billable	review and supplement letter to client re settlement
10/12/2018	Seth Packrone	0:06:00	Billable	Check in with P. Leahy and M. Goodell re: plan for call with garcia counsel re: potential elements to include in Adam X. settlement
10/12/2018	Seth Packrone	0:12:00	Billable	Edit letter to Defendants based on M. Goodell's feedback
10/12/2018	Seth Packrone	0:30:00	Billable	Tc with counsel for plaintiffs in Garcia re: challenges of providing services in adult correctional facility
10/12/2018	Seth Packrone	0:06:00	Billable	Follow up tc with P. Leahy re: takeaways from call for potential settlement elements
10/12/2018	Seth Packrone	0:06:00	Billable	Send first draft of letter to Defendants to ACLU with notes for next steps
10/12/2018	Seth Packrone	0:06:00	Billable	Correspond with ACLU re: setting up client phone calls
10/12/2018	Seth Packrone	0:12:00	Billable	Draft letter to client and edit to send
10/12/2018	Seth Packrone	0:06:00	Billable	Follow up with external consultant re: checking in about settlement negotiations
10/13/2018	Seth Packrone	0:06:00	Billable	Correspond with consulting expert re: time to discuss outstanding issue
10/15/2018	Maia Goodell	0:06:00	Billable	planning for settlement call
10/15/2018	Seth Packrone	0:06:00	Billable	Review confidentiality order and correspond with M. Goodell re: same
10/15/2018	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: plan for call with external consultant tomorrow
10/15/2018	Seth Packrone	0:12:00	Billable	Correspond with external consultant re: materials for tomorrow's call
10/15/2018	Seth Packrone	0:12:00	Billable	Review/take notes on NJDOC education policies listed by Gagnon in report
10/15/2018	Seth Packrone	0:06:00	Billable	Correspond with P. Leahy re: questions about NJDOC policies
10/15/2018	Seth Packrone	0:12:00	Billable	Tc with P. Leahy re: updated NJDOC policies on attendance/waiver of attendance
10/16/2018	Seth Packrone	0:06:00	Billable	Correspond with P. Leahy re: follow up questions about NJDOC special education policies and reviewing state comparison chart
10/16/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: status of letter to Defendants
10/16/2018	Seth Packrone	1:24:00	Billable	Tc with external consultant re: settlement positions for next Monday's meeting
10/16/2018	Seth Packrone	0:06:00	Billable	Edit letter to defendants based on ACLU's comments
10/16/2018	Seth Packrone	0:06:00	Billable	Send letter to defendants to team with request for feedback
10/17/2018	Seth Packrone	0:12:00	Billable	Correspond with ACLU re: upcoming meeting with team, client, and settlement conference
10/17/2018	Seth Packrone	0:06:00	Billable	Correspond with P. Leahy re: research on NJDOC education policies
10/17/2018	Seth Packrone	0:18:00	Billable	Review/edit chart compiling state DOC policies on special education
10/17/2018	Seth Packrone	0:06:00	Billable	Tc with Arc of NJ re: update on case
10/17/2018	Seth Packrone	0:12:00	Billable	Update settlement chart based on letter to Defendants
10/17/2018	Seth Packrone	0:06:00	Billable	Edit letter to defendants based on edits to settlement chart
10/17/2018	Seth Packrone	0:06:00	Billable	Correspond with team re: edits to letter/settlement chart
10/17/2018	Seth Packrone	0:18:00	Billable	Tc with Arc of NJ re: update on settlement and approaches to clustering services
10/17/2018	Seth Packrone	0:18:00	Billable	Edit/finalize settlement chart and letter to Defendants
10/17/2018	Seth Packrone	0:06:00	Billable	Send final chart/letter to Defendants

10/17/2018	Seth Packrone	0:24:00	Billable	Tc with P. Leahy re: other state doc policies for relevance to Adam X.
10/18/2018	Michelle Caiola	0:06:00	Billable	status update from SP re upcoming settlement conference
10/18/2018	Seth Packrone	0:06:00	Billable	Correspond with M. Goodell re: plan for Monday's settlement conference
10/18/2018	Seth Packrone	0:06:00	Billable	Prep for call with Casey Z.
10/18/2018	Seth Packrone	0:36:00	Billable	Tc with Casey Z. re: update on status of case and settlement
10/18/2018	Seth Packrone	0:06:00	Billable	Update M. Caiola re: plan for settlementn conference on Monday
10/18/2018	Seth Packrone	0:30:00	Billable	Tc with litigation team (P. Leahy, J. LoCicero, T. Borden, A. Pollioni, and C. Bowman) re: plan for Monday's settlementn conference
10/19/2018	Seth Packrone	0:06:00	Billable	Tc with S. Seaborn re: strategies for calculating comp ed
10/19/2018	Seth Packrone	0:12:00	Billable	Draft notes from call with external consultant
10/19/2018	Seth Packrone	0:12:00	Billable	Draft email to team with update on research
10/19/2018	Seth Packrone	0:12:00	Billable	Follow up with ACLU re: plan for settlement conference and ideas for comp ed.
10/19/2018	Seth Packrone	0:12:00	Billable	Prep for settlement conference
10/22/2018	Maia Goodell	0:24:00	Billable	review report of court conference and plan next steps
10/22/2018	Michelle Caiola	0:06:00	Billable	report from SP re court counference
10/22/2018	Seth Packrone	1:12:00	Billable	Travel to and from DNJ courthouse for conference with Defendants (2.5 total, bill half)
10/22/2018	Seth Packrone	1:48:00	Billable	Settlement conference with Defendants and court with J. LoCicero and T. Borden
10/22/2018	Seth Packrone	0:06:00	Billable	Correspond with team re: results of settlement conference and next steps for follow up
10/22/2018	Seth Packrone	0:12:00	Billable	Update M. Goodell and M. Caiola re: next steps for case and results of settlement conference with judges
10/22/2018	Seth Packrone	0:24:00	Billable	Tc with team (C. Bowman, A. Pollioni, J. LoCicero, E. Huertas, and T. Borden) re: update on settlement conference with court and next stesp for settlement negotiations
10/22/2018	Seth Packrone	0:06:00	Billable	Correspond with M. Caiola and S. Seaborn re: update on settlement conference
10/22/2018	Seth Packrone	0:06:00	Billable	Correspond with P. Leahy re: student waiver in NJ and settlement research
10/23/2018	Seth Packrone	0:12:00	Billable	Update M. Goodell re: results of settlement conference with judge
10/23/2018	Seth Packrone	0:06:00	Billable	Tc with P. Leahy re: next steps for settlement research
10/24/2018	Seth Packrone	0:06:00	Billable	Tc with client, Brian Y, re: update on case
10/29/2018	Seth Packrone	0:06:00	Billable	Tc with Brian Y. re: update on case
11/6/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: plan for reaching out to potential monitors and Defendants
11/7/2018	Seth Packrone	0:06:00	Billable	Review court orders to plan for upcoming deadlines in case
11/7/2018	Seth Packrone	0:30:00	Billable	Tc with Bloomberg reporter re: status of case
11/7/2018	Seth Packrone	0:24:00	Billable	Tc with T. Borden re: next step for reaching out to potential monitors
11/7/2018	Seth Packrone	0:12:00	Billable	Draft emails to Lockwood and potential expert
11/7/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: status of outreach to potential experts
11/7/2018	Seth Packrone	0:12:00	Billable	Correspond with potential expert and S. Lockwood
11/7/2018	Seth Packrone	0:06:00	Billable	Follow up with experts/schedule calls with potential monitors
11/8/2018	Seth Packrone	0:06:00	Billable	Correspond with S. Lockwood re: potential for being considered as a monitor for case
11/8/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Zito re: monitoring role in prison education cases
11/8/2018	Seth Packrone	0:12:00	Billable	Tc with T. Zito re: role for monitors in spec ed corrections cases
11/8/2018	Seth Packrone	0:06:00	Billable	Tc with T. Borden re: prep for call with potential expert
11/8/2018	Seth Packrone	0:24:00	Billable	Tc with T. Borden and potential expert re: potential for monitoring position in Adam X.
11/8/2018	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: next steps for monitoring proposal

11/8/2018	Seth Packrone	0:12:00	Billable	Tc with T. Borden and Susan Lockwood re: potential for serving as monitor in case
11/8/2018	Seth Packrone	0:06:00	Billable	Tc with T. Borden re: next steps for following up with Defendants about a monitor
11/9/2018	Seth Packrone	0:18:00	Billable	Draft short memo re: summary of outreach to potential monitors
11/9/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: summary of meetings with potential monitors
11/12/2018	Seth Packrone	0:06:00	Billable	Correspond with team and check in with M. Goodell re: plan for co-counsel call
11/12/2018	Seth Packrone	0:06:00	Billable	Review Garcia/Casey A. settlement summary for potential issues in Adam X.
11/12/2018	Seth Packrone	0:06:00	Billable	Correspond with P. Leahy re: status of Garcia and Casey settlement reasearch for potential Adam X. issues
11/13/2018	Seth Packrone	0:06:00	Billable	Correspond with team re: plan for next call
11/15/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: Ds' response to monitor
11/15/2018	Seth Packrone	0:06:00	Billable	Correspond with M. Caiola, M. Goodell, and P. Leahy re: monitor update and settlement research moving forward
11/16/2018	Seth Packrone	0:06:00	Billable	Draft agenda and send to T. borden with note for feedback
11/16/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden and team re: plan/agenda for Monday's call
11/19/2018	Maia Goodell	0:18:00	Billable	call with co-counsel re settlement w/ S. Packrone
11/19/2018	Seth Packrone	0:18:00	Billable	Tc with JL, T. Borden, A. Pollioni, M. Goodell, and P. Leahy re: plan for call with court
11/19/2018	Seth Packrone	0:18:00	Billable	Draft talking points for call with Court tomorrow
11/19/2018	Seth Packrone	0:06:00	Billable	Check in with T. Borden and J. LoCicero re: plan for call with Court
11/20/2018	Seth Packrone	0:06:00	Billable	Prep for tc with Court re: status of settlement negotiations
11/20/2018	Seth Packrone	0:06:00	Billable	Correspond with lockwood re: CV
11/20/2018	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: plan for court call
11/20/2018	Seth Packrone	0:12:00	Billable	Tc with court and T. Borden and C. Bowman re: status of settlement negotiations
11/20/2018	Seth Packrone	0:12:00	Billable	Follow up strategy session re: next steps for negotiations with T. Borden and C. Bowman
11/20/2018	Seth Packrone	0:06:00	Billable	Update M. Goodell re: next steps for case
11/20/2018	Seth Packrone	0:06:00	Billable	Correspond with team re: proposing Lockwood as monitor
11/20/2018	Seth Packrone	0:18:00	Billable	Follow up with potential external monitor and draft email to Defendants re: external monitors
11/21/2018	Seth Packrone	0:06:00	Billable	Review potential expert CV
11/21/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: potential expert CV and plan for sending experts to Defendants
11/21/2018	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: plan for sending expert recommendations to Defendants
11/21/2018	Seth Packrone	0:06:00	Billable	Review civil service research and correspond with T. Borden re: same
11/28/2018	Seth Packrone	0:06:00	Billable	Tc with T. Borden re: update on status of client contacts
11/29/2018	Maia Goodell	0:12:00	Billable	call with co-counsel re upcoming call with court with S. Packrone
11/29/2018	Seth Packrone	0:12:00	Billable	Tc with team (M. Goodell, J. LoCicero, T. Borden, E. Huertas, and A. Pollioni) re: plan for next week's call with the Court
11/29/2018	Seth Packrone	0:06:00	Billable	Tc with T. Borden re: plan for call with client
11/29/2018	Seth Packrone	0:18:00	Billable	Tc with client and T. Borden re: update on case
11/29/2018	Seth Packrone	0:06:00	Billable	Follow up tc with T. Borden re: next steps for case
12/4/2018	Maia Goodell	0:06:00	Billable	planning session with S.Packrone re response to upcoming settlement proposal
12/4/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: court order and due date for joint letter
12/4/2018	Seth Packrone	0:06:00	Billable	Prep for tc with court re: status of settlement
12/4/2018	Seth Packrone	0:12:00	Billable	Tc with court and Defendants re: status of settlement negotiations and next steps
12/4/2018	Seth Packrone	0:12:00	Billable	Follow up tc with co-counsel, T. Borden, E. Huertas, C. Bowman, and A. Pollioni re: next steps for case and timeline for responding to Defendants

12/4/2018	Seth Packrone	0:06:00	Billable	Update M. Goodell re: next steps for case and update on call with court
12/10/2018	Seth Packrone	0:06:00	Billable	Correspond with client, Arc of NJ, re: case update
12/11/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: response to Defendants about experts
12/11/2018	Seth Packrone	0:06:00	Billable	Correspond with client, Arc of NJ, and T. Borden re: meeting on Friday
12/13/2018	Maia Goodell	0:12:00	Billable	call with co-counsel re next steps in settlement with S. Packrone and P. Leahy
12/13/2018	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: plan for call today
12/13/2018	Seth Packrone	0:12:00	Billable	Tc with team with P. Leahy and M. Goodell re: next steps for settlement negotiations
12/14/2018	Seth Packrone	0:24:00	Billable	Tc with client, Arc of NJ, and T. Borden re: update on case and next steps
12/14/2018	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: next steps for case until the 1/14 settlement conference
12/18/2018	Seth Packrone	0:18:00	Billable	Review/analyze potential monitor, Susan Lockwood's report in other cases
12/18/2018	Seth Packrone	0:06:00	Billable	Correspond with team re: conference with Defendants in January
1/2/2019	Michelle Caiola	0:06:00	Billable	update from SP re Def response
1/2/2019	Seth Packrone	0:06:00	Billable	Review emails with team and opposing counsel from holiday break
1/3/2019	Maia Goodell	1:30:00	Billable	analysis and notes re defendant settlement proposal
1/3/2019	Maia Goodell	0:36:00	Billable	call with co-counsel re analysis and response to defendant settlement position, strategy for joint letter with P. Leahy and S. Packrone
1/3/2019	Maia Goodell	0:24:00	Billable	strategy session with S.Packrone for joint letter and court conference
1/3/2019	Seth Packrone	0:06:00	Billable	Check in with A. Pollioni re: status of settlement proposal summary
1/3/2019	Seth Packrone	0:12:00	Billable	Check in with M. Goodell re: analysis of settlement rproposal from Ds
1/3/2019	Seth Packrone	0:18:00	Billable	Review DOC/DOE response to our settlement proposal
1/3/2019	Seth Packrone	0:36:00	Billable	Tc with team re: next steps for case after DOC/DOE proposal with P. Leahy and M. Goodell
1/3/2019	Seth Packrone	0:24:00	Billable	Follow up strategy session with M. Goodell re: next steps for case
1/4/2019	Seth Packrone	0:12:00	Billable	Tc with A. Pollioni re: plan for letter to court
1/7/2019	Maia Goodell	0:30:00	Billable	review and supplement draft letter to court re defendant failure to provide substantive settlement response
1/7/2019	Maia Goodell	0:18:00	Billable	planning for call with opposing counsel re settlement
1/7/2019	Seth Packrone	0:12:00	Billable	Check in with M. Goodell re: plan for tomorrow's settlemetn conference
1/7/2019	Seth Packrone	0:06:00	Billable	Tc with t. Borden re: plan for tomorrow's settlemetn conference
1/7/2019	Seth Packrone	0:12:00	Billable	Review draft of letter to court to prep for tomorrow's settlemetn conference
1/7/2019	Seth Packrone	0:06:00	Billable	Correspond with M. goodell re: plan for tomorrow based on letter from Proskauer
1/8/2019	Seth Packrone	0:12:00	Billable	Review T. Borden's edits to letter and prep for settlement conference
1/8/2019	Seth Packrone	0:12:00	Billable	Tc with M. Goodell re: prep for settlement conference
1/8/2019	Seth Packrone	0:12:00	Billable	Tc with client re: update on situation
1/8/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: plan for settlement conference
1/8/2019	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: plan for settlemetn conference and draft of letter
1/8/2019	Seth Packrone	0:54:00	Billable	Tc with T. Borden, A. Pollioni, C. Bowman, E. Huertas, and Defendants re: settlement conference
1/8/2019	Seth Packrone	0:06:00	Billable	Follow up strategy session with team re: next steps for case
1/8/2019	Seth Packrone	0:12:00	Billable	Tc with M. Goodell re: update on settlement conference and next steps
1/8/2019	Seth Packrone	0:06:00	Billable	Edit T. Borden's draft of joint letter to Defendants
1/8/2019	Seth Packrone	1:06:00	Billable	Edit Plaintiffs' position seciton of joint letter to court
1/8/2019	Seth Packrone	0:06:00	Billable	Send joint letter draft to M. Goodell

1/9/2019	Maia Goodell	1:24:00	Billable	review and supplement plaintiffs' position for joint letter to court re settlement
1/9/2019	Maia Goodell	0:18:00	Billable	strategy session re plaintiffs' settlement position with S.Packrone
1/9/2019	Maia Goodell	0:54:00	Billable	review S.Packrone research and supplement plaintiffs' position for joint letter to court re settlement per same
1/9/2019	Maia Goodell	0:06:00	Billable	review edits to joint position from co-counsel
1/9/2019	Michelle Caiola	0:06:00	Billable	update from SP re: status of letter to court
1/9/2019	Seth Packrone	0:06:00	Billable	Review/edit skeletal draft of joint letter
1/9/2019	Seth Packrone	0:06:00	Billable	Check in with M. Caiola re: update on status of settlement negotiations
1/9/2019	Seth Packrone	0:18:00	Billable	Strategy session with M. Goodell re: status of plaintiffs' position for joint letter and specific requests to highlight with Court
1/9/2019	Seth Packrone	0:06:00	Billable	Send P. Leahy instructions re: editing settlement chart
1/9/2019	Seth Packrone	0:12:00	Billable	Legal research re: rebutting Defendants' legal positions in settlement response
1/9/2019	Seth Packrone	0:54:00	Billable	Edit/revise plaintiffs' position for joint settlement letter to Court
1/9/2019	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: joint letter
1/9/2019	Seth Packrone	0:06:00	Billable	Review settlement offer from Defendants
1/9/2019	Seth Packrone	0:06:00	Billable	Finalize draft of Plaintiffs' position to send to team
1/9/2019	Seth Packrone	0:06:00	Billable	Send Plaintiffs' draft to team with note for next steps
1/9/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: settlement history
1/9/2019	Seth Packrone	0:06:00	Billable	Check in with P. Leahy re: plan for updating settlement chart
1/9/2019	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: plan for finalizing letter and strategy for settlement conference on Monday
1/10/2019	Maia Goodell	0:18:00	Billable	review co-counsel edits and supplement Plaintiff position for joint letter to Court
1/10/2019	Maia Goodell	0:24:00	Billable	review defendant position for Court update letter
1/10/2019	Maia Goodell	0:18:00	Billable	draft edits to plaintiffs' position per defendant positions
1/10/2019	Maia Goodell	0:12:00	Billable	review communications with opposing counsel re joint letter to court re settlement update
1/10/2019	Maia Goodell	1:00:00	Billable	analysis of defendant settlement charts; draft strategic plan for response
1/10/2019	Seth Packrone	0:06:00	Billable	Review Proskauer edits to joint letter
1/10/2019	Seth Packrone	0:12:00	Billable	Check in with M. Goodell re: next steps for joint letter
1/10/2019	Seth Packrone	0:06:00	Billable	Review new draft of joint letter
1/10/2019	Seth Packrone	0:06:00	Billable	Review emails with team re: DOE/DOC edits to joint letter
1/10/2019	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: next steps for case
1/11/2019	Maia Goodell	2:00:00	Billable	review and draft analysis of defendant settlement positions and plan for plaintiffs' response
1/11/2019	Maia Goodell	1:00:00	Billable	call with co-counsel T. Borden and S. Packrone re strategy for court conference
1/11/2019	Maia Goodell	0:18:00	Billable	plan next steps with S.Packrone for court conference
1/11/2019	Michelle Caiola	0:12:00	Billable	update from SP and next steps
1/11/2019	Seth Packrone	0:24:00	Billable	Strategy session with M. Goodell re: plan for Monday's settlement conference
1/11/2019	Seth Packrone	0:24:00	Billable	Edit settlement chart with positions for Monday
1/11/2019	Seth Packrone	1:00:00	Billable	Tc with T. Borden and M. Goodell re: settlement positions for Monday
1/11/2019	Seth Packrone	0:18:00	Billable	Follow up strategy session with M. Goodell re: plan for Monday
1/11/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: time for site visits
1/11/2019	Seth Packrone	0:24:00	Billable	Final edits to settlement chart for Monday
1/13/2019	Seth Packrone	1:30:00	Billable	Prep for settlement conference by reviewing documents and developing settlement terms

1/14/2019	Seth Packrone	0:36:00	Billable	Travel to settlement conference in Trenton, NJ (bill half, total was 80 minutes)
1/14/2019	Seth Packrone	0:24:00	Billable	Prep for settlement conference by reviewing notes and conferencing with team
1/14/2019	Seth Packrone	2:12:00	Billable	Settlement conference with Court, Defendants, T. Borden, A. Pollioni, and J. LoCicero
1/14/2019	Seth Packrone	0:18:00	Billable	Debrief settlement conference and next steps for following up with Defendants
1/14/2019	Seth Packrone	0:42:00	Billable	Travel from settlement conference in Trenton, NJ back (bill half, total was 85 minutes)
1/14/2019	Seth Packrone	0:24:00	Billable	Draft update for team re: result of settlement conference and next steps for case
1/14/2019	Seth Packrone	0:06:00	Billable	Correspond with team re: calls with Defendants and upcoming court conferences
1/14/2019	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: next steps for responding to Defendants
1/14/2019	Seth Packrone	0:12:00	Billable	Send litigation team plan for responding to Defendants' latest proposals
1/16/2019	Maia Goodell	0:30:00	Billable	strategy session with S.Packrone re response to DOE settlement proposal
1/16/2019	Maia Goodell	0:18:00	Billable	planning for response to DOC settlement position
1/16/2019	Seth Packrone	0:12:00	Billable	Tc with client re: update on situation
1/16/2019	Seth Packrone	0:30:00	Billable	Strategy session with M. Goodell on settlement conference and discuss DOE response
1/16/2019	Seth Packrone	0:06:00	Billable	Review notes from A. Pollioni from settlement conference to draft response to DOE
1/16/2019	Seth Packrone	1:00:00	Billable	Work on draft of response to DOE's CAP proposal
1/16/2019	Seth Packrone	0:12:00	Billable	Strategy session with M. Goodell re: next steps for following up with client
1/16/2019	Seth Packrone	0:24:00	Billable	Outline draft response to DOE CAP proposal
1/17/2019	Maia Goodell	2:12:00	Billable	review and supplement draft response to DOC re settlement
1/17/2019	Maia Goodell	0:30:00	Billable	analysis of DOC settlement position and strategy for response with S.Packrone
1/17/2019	Seth Packrone	0:24:00	Billable	Finish response to DOE CAP proposal for Monitoring Areas
1/17/2019	Seth Packrone	0:24:00	Billable	Draft response to Procedures for Monitoring section of DOE CAP
1/17/2019	Seth Packrone	0:18:00	Billable	Draft response to Checklist portion of DOE CAP response
1/17/2019	Seth Packrone	0:30:00	Billable	Draft response to DCFs section of DOE CAP proposal
1/17/2019	Seth Packrone	0:12:00	Billable	Draft email to T. Borden with draft for Defendants
1/17/2019	Seth Packrone	0:12:00	Billable	Check in with M. Goodell re: approach in CAP
1/17/2019	Seth Packrone	0:12:00	Billable	Draft intro with list of concerns for DOE response
1/17/2019	Seth Packrone	0:12:00	Billable	Draft introduction to DOE response
1/17/2019	Seth Packrone	0:42:00	Billable	Revise/edit first draft of response to DOE
1/17/2019	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: approach to DOE CAP response
1/17/2019	Seth Packrone	0:06:00	Billable	Clarify revisions section of DOE CAP response with M. Goodell
1/17/2019	Seth Packrone	0:30:00	Billable	Get feedback on DOE letter response from M. Goodell
1/17/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden and A. Pollioni re: approach for DOC response
1/17/2019	Seth Packrone	0:36:00	Billable	Revise DOE response based on M. Goodell's feedback.comments
1/18/2019	Maia Goodell	0:12:00	Billable	discuss response to settlement position with S.Packrone
1/18/2019	Maia Goodell	0:18:00	Billable	review draft response to DOC position received from co-counsel; strategy for supplementing same
1/18/2019	Seth Packrone	0:18:00	Billable	Review DOE letter response and make edits to first draft
1/18/2019	Seth Packrone	0:06:00	Billable	Send DOE response first draft to T. Borden
1/18/2019	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: informing Lockwood of selection
1/18/2019	Seth Packrone	0:12:00	Billable	Draft update for external expert

1/18/2019	Seth Packrone	0:06:00	Billable	Send external monitor update about selection
1/18/2019	Seth Packrone	0:06:00	Billable	Correspond with external monitor re: next step
1/18/2019	Seth Packrone	0:06:00	Billable	Check in with T. Borden re: status of DOC response
1/18/2019	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: status of DOC response
1/22/2019	Maia Goodell	0:06:00	Billable	review draft response to DOC
1/22/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: child find provisions
1/23/2019	Maia Goodell	0:42:00	Billable	strategy for response to DOC settlement position
1/23/2019	Seth Packrone	0:12:00	Billable	Correspond with team re: status of settlement responses and plan for today's call
1/23/2019	Seth Packrone	0:18:00	Billable	Prep for settlement call with Defendants and prep questions
1/23/2019	Seth Packrone	0:18:00	Billable	Tc with T. Borden re: status of settlement responses and plan for settlement call
1/23/2019	Seth Packrone	0:12:00	Billable	Tc with P. Leahy to give him instructions re: evaluating DOC settlement responses
1/23/2019	Seth Packrone	0:48:00	Billable	Tc with T. Borden, A. Pollioni, C. Bowman, and E. Huertas with Defendants re: status of settlement proposal
1/23/2019	Seth Packrone	0:12:00	Billable	Tc with T. Borden and A. Pollioni re: plan for editing settlement responses
1/23/2019	Seth Packrone	0:06:00	Billable	Follow up tc with T. Borden re: status of DOC response
1/23/2019	Seth Packrone	0:30:00	Billable	Check in with M. Goodell re: strategies for next steps in settlement
1/23/2019	Seth Packrone	0:06:00	Billable	Tc with P. Leahy re: question about our responses to DOC settlement offer
1/24/2019	Maia Goodell	0:18:00	Billable	planning and analysis for streamlined response to DOC and DOE proposals
1/24/2019	Seth Packrone	0:36:00	Billable	Review settlement chart with DOC responses
1/24/2019	Seth Packrone	0:18:00	Billable	Tc with P. Leahy re: process for editing DOC response chart and letter
1/24/2019	Seth Packrone	0:12:00	Billable	Check in with M. Goodell re: next steps for responding to DOC
1/24/2019	Seth Packrone	0:06:00	Billable	Review settlement positions in DOC chart
1/24/2019	Seth Packrone	0:24:00	Billable	Check in with M. Goodell re: plan for responding to DOC
1/24/2019	Seth Packrone	0:06:00	Billable	Follow up with P. Leahy re: revising chart
1/24/2019	Seth Packrone	0:12:00	Billable	Review DOC response letter and edit
1/24/2019	Seth Packrone	0:06:00	Billable	Check in with M. Goodell and P. Leahy re: plan for editing letter
1/24/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: status of settlement response
1/25/2019	Maia Goodell	1:42:00	Billable	review and supplement letter to opposing counsel re settlement
1/25/2019	Maia Goodell	0:18:00	Billable	strategy session with S.Packrone re response to settlement proposal, planning for court conference
1/25/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: status of settlement letter
1/25/2019	Seth Packrone	1:18:00	Billable	Edit DOC section of letter
1/25/2019	Seth Packrone	0:06:00	Billable	Correspond with M. Goodell re: status of Adam X. letter
1/25/2019	Seth Packrone	0:48:00	Billable	Review/edit settlement letter based on M. Goodell's edits
1/25/2019	Seth Packrone	0:18:00	Billable	Check in with M. Goodell re: further edits to settlement letter
1/25/2019	Seth Packrone	0:18:00	Billable	Tc with T. Borden re: next steps for revising letter to Defendants
1/27/2019	Seth Packrone	0:42:00	Billable	Update letter response to Defendants and correspond with T. Borden re: same
1/27/2019	Seth Packrone	0:42:00	Billable	finalize settlement letter to send to Defendants
1/27/2019	Seth Packrone	0:06:00	Billable	Send letter to T. Borden with notes to submit to defendants
1/28/2019	Seth Packrone	0:06:00	Billable	Follow up with M. Caiola re: update on settlement response
1/29/2019	Maia Goodell	0:12:00	Billable	analysis of communication from monitor re schedule

1/29/2019	Michelle Caiola	0:12:00	Billable	review latest letter to Def re settlement and terms; feedback to SP
1/29/2019	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: update on expert
1/29/2019	Seth Packrone	0:06:00	Billable	Follow up with monitor re: update on situation
1/29/2019	Seth Packrone	0:06:00	Billable	Correspond with opposing counsel re: update on expert
1/30/2019	Michelle Caiola	0:12:00	Billable	check in with S Packrone re expert and next step
2/1/2019	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: plan for external monitor
2/1/2019	Seth Packrone	0:18:00	Billable	Strategy session with M. Goodell re: plan for external monitor moving forward
2/1/2019	Seth Packrone	0:06:00	Billable	Follow up with T. Borden re: next steps for external monitor
2/1/2019	Seth Packrone	0:06:00	Billable	Correspond with Dr. Roberts re: update on external monitor situation
2/4/2019	Seth Packrone	0:06:00	Billable	Give R. Moser instructions re: including policies for settlement binder
2/5/2019	Seth Packrone	0:48:00	Billable	Review/analyze/take notes on Adam X. policies produced by Defendants in late January
2/5/2019	Seth Packrone	0:06:00	Billable	Give P. Leahy instructions re: reviewing policies and determining if they respond to our positions
2/5/2019	Seth Packrone	0:06:00	Billable	Follow up with litigation team re: plan for meeting with Defendants
2/5/2019	Seth Packrone	0:30:00	Billable	Tc with T. Zito re: update on expert and tips on structure for settlement
2/6/2019	Seth Packrone	0:06:00	Billable	Review P. Leahy's draft of policy analysis
2/6/2019	Seth Packrone	0:06:00	Billable	Follow up with team re: plan for tomorrow's meeting with Defendants
2/6/2019	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: plan for settlement conference
2/6/2019	Seth Packrone	0:36:00	Billable	Tc with T. Borden and E. Huertas re: next steps for expert and plan for tomorrow's conference with Defendants
2/6/2019	Seth Packrone	0:18:00	Billable	Draft agenda and talking points for settlement conference with Defendants
2/6/2019	Seth Packrone	0:12:00	Billable	Review policy analysis from P. Leahy
2/6/2019	Seth Packrone	0:06:00	Billable	Follow up with T. Borden and E. Huertas re: plan for next week and visiting client
2/6/2019	Seth Packrone	0:06:00	Billable	Give R. Moser instructions re: setting up client visit
2/6/2019	Seth Packrone	0:06:00	Billable	Update M. Goodell re: plan for settlement meeting
2/7/2019	Maia Goodell	0:24:00	Billable	planning for call with opposing counsel re settlement
2/7/2019	Seth Packrone	0:18:00	Billable	Prep for meeting with Defendants by reviewing most recent settlement communications
2/7/2019	Seth Packrone	1:00:00	Billable	Settlement teleconference with litigation team and opposing counsel from NJDOC
2/7/2019	Seth Packrone	0:12:00	Billable	Follow up tc with team (T. Borden, A. Pollioni, and C. Bowman) re: follow up from settlement conference
2/7/2019	Seth Packrone	0:30:00	Billable	Update M. Goodell re: results of settlement conference and plan for settlement conference
2/8/2019	Seth Packrone	0:12:00	Billable	Check in with M. Goodell re: status of settlement negotiations and next steps
2/8/2019	Seth Packrone	0:18:00	Billable	Draft cover letter to submit to Court
2/8/2019	Seth Packrone	0:06:00	Billable	Correspond with M. Goodell and T. Borden re: submitting settlement to Court
2/8/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: status of communication with Defendants
2/8/2019	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: plan for Monday's settlement conference
2/8/2019	Seth Packrone	0:24:00	Billable	Prep for Monday's settlement conference
2/11/2019	Maia Goodell	0:12:00	Billable	analysis of settlement conference and planning for next steps with S.Packrone
2/11/2019	Seth Packrone	0:36:00	Billable	Travel to District Court NJ for settlement conference with Defendants from home in Jersey City (bill half, total was 1.3)
2/11/2019	Seth Packrone	0:06:00	Billable	Travel from District Court to DOC facility (bill half, total was .3)
2/11/2019	Seth Packrone	1:18:00	Billable	Settlement Conference with Judge Wolfson and Judge Goodman (T. Borden, A. Pollioni, and E. Huertas)
2/11/2019	Seth Packrone	0:36:00	Billable	Follow up meeting with Defendants (T. Borden, A. Pollioni, and E. Huertas) following the settlement conference

2/11/2019	Seth Packrone	0:18:00	Billable	Follow up strategy session with T. Borden, A. Pollioni, and E. Huertas re: next steps for case
2/11/2019	Seth Packrone	1:00:00	Billable	Meet with client re: update on case
2/11/2019	Seth Packrone	0:06:00	Billable	Update M. Goodell re: results of settlement conference
2/11/2019	Seth Packrone	0:36:00	Billable	Travel from DOC Facility to Jersey City (bill half, total was 1.2)
2/12/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: plan for meeting with Kathy Wright
2/12/2019	Seth Packrone	0:12:00	Billable	Review sample settlement to begin work on settlement agreement
2/12/2019	Seth Packrone	0:12:00	Billable	Correspond with team (A. Pollioni and T. Borden) re: time to collaborate about settlement agreement
2/13/2019	Maia Goodell	0:24:00	Billable	analysis of settlement conference and planning for next steps with S.Packrone
2/13/2019	Seth Packrone	0:12:00	Billable	Review sample settlements and prep for call with team re: next steps for settlement
2/13/2019	Seth Packrone	0:36:00	Billable	Tc with team (T. Borden, E. Huertas, and A. Pollioni) re: next steps for settlement
2/13/2019	Seth Packrone	0:18:00	Billable	Update M. Goodell re: conference with judge and next steps for drafting response to Defendants
2/13/2019	Seth Packrone	0:12:00	Billable	Send update to team re: plan for drafting settlement documents
2/13/2019	Seth Packrone	0:06:00	Billable	Correspond with opposing counsel re: call with external monitor
2/13/2019	Seth Packrone	1:18:00	Billable	Draft first draft of MOU for CAP development/implementation
2/14/2019	Maia Goodell	0:24:00	Billable	review draft MOU for corrective action plan process
2/14/2019	Maia Goodell	0:48:00	Billable	call with co-counsel re MOU, settlement agreement, strategy for next settlement session
2/14/2019	Michelle Caiola	0:18:00	Billable	t/c with SP re attending conference - concerns and how to address the next steps - use of expert
2/14/2019	Seth Packrone	0:36:00	Billable	Finalize first draft of MOU and send to M. Goodell for her review
2/14/2019	Seth Packrone	0:12:00	Billable	Review draft settlement agreement and prep for team call
2/14/2019	Seth Packrone	0:06:00	Billable	Correspond with Defendants re: call with expert
2/14/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: call with expert
2/14/2019	Seth Packrone	0:12:00	Billable	Correspond with potential external monitor re: status of meeting
2/14/2019	Seth Packrone	0:06:00	Billable	Correspond with opposing counsel and T. Borden re: joint meeting with potential external monitor
2/14/2019	Seth Packrone	0:06:00	Billable	Check in with T. Zito re: external monitor candidates
2/14/2019	Seth Packrone	0:48:00	Billable	Tc with M. Goodell, T. Borden, A. Pollioni, C. Bowman, J. LoCicero, and E. Huertas re: next steps for settlement
2/14/2019	Seth Packrone	0:18:00	Billable	Tc with M. Caiola re: update on settlement status
2/15/2019	Maia Goodell	0:12:00	Billable	review and plan response to opposing counsel re delay in providing settlement response
2/15/2019	Michelle Caiola	0:06:00	Billable	update from SP re new proposals for remediation; scheduling conference
2/15/2019	Seth Packrone	0:06:00	Billable	Check in with external monitor re: plan for call on 2/25
2/15/2019	Seth Packrone	0:18:00	Billable	Revise MOU and circulate to team with notes for edits
2/15/2019	Seth Packrone	0:24:00	Billable	Tc with T. Zito re: potential external monitors
2/15/2019	Seth Packrone	0:18:00	Billable	Review DOC response to settlement proposal
2/15/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: response to Defendants
2/15/2019	Seth Packrone	0:12:00	Billable	Tc with T. Borden and E. Huertas re: responding to Defendants
2/19/2019	Seth Packrone	0:06:00	Billable	Review Defendants settlement proposal
2/20/2019	Maia Goodell	0:30:00	Billable	review DOC settlement response; plan response
2/20/2019	Maia Goodell	0:30:00	Billable	review draft response to DOC re settlement
2/20/2019	Seth Packrone	0:36:00	Billable	Review/take notes/analyze Defendants' 2.15.19 settlement response to prep to write a response
2/20/2019	Seth Packrone	0:06:00	Billable	Outline response to Defendants

2/20/2019	Seth Packrone	0:12:00	Billable	Correspond with team re: next steps for follow up with Defendants
2/20/2019	Seth Packrone	0:12:00	Billable	check in with M. Goodell re: plan for responding to Defendants
2/20/2019	Seth Packrone	0:06:00	Billable	Correspond with team re: edits to MOU
2/20/2019	Seth Packrone	0:54:00	Billable	Draft response to DOC's February 15 proposal re: information requests and points of agreement
2/20/2019	Seth Packrone	1:42:00	Billable	Draft response to DOC's February 15 proposal re: points of disagreement
2/20/2019	Seth Packrone	0:24:00	Billable	Revise/send draft response to DOC's February 15 proposal to M. Goodell for feedback
2/20/2019	Seth Packrone	0:06:00	Billable	Review edits to MOU
2/20/2019	Seth Packrone	0:06:00	Billable	Finalize draft of MOU
2/20/2019	Seth Packrone	0:18:00	Billable	Get feedback from M. Goodell on letter response to DOC
2/20/2019	Seth Packrone	0:18:00	Billable	Edit first draft of letter response to Defendants
2/20/2019	Seth Packrone	0:06:00	Billable	Send first of letter response to Defendants
2/21/2019	Maia Goodell	0:12:00	Billable	review and supplement letter to DOC re settlement response
2/21/2019	Maia Goodell	0:30:00	Billable	call with co-counsel re class definition, settlement positions
2/21/2019	Seth Packrone	0:06:00	Billable	Check in with co-counsel re: plan for edits to letter
2/21/2019	Seth Packrone	0:06:00	Billable	Correspond with co-counsel re: edits to letter
2/21/2019	Seth Packrone	0:06:00	Billable	Review P. Leahy's expert research
2/21/2019	Seth Packrone	0:18:00	Billable	Input co-counsel's edits into letter to Ds
2/21/2019	Seth Packrone	0:30:00	Billable	Tc with team (M. Goodell, P. Leahy, T. Borden, E. Huertas, J. LoCicero, A. Pollioni, and C. Bowman) re: edits to settlement letter and class definition
2/21/2019	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: plan for editing/sending letter to Defendants
2/21/2019	Seth Packrone	0:06:00	Billable	Edit letter based on feedback on team call
2/21/2019	Seth Packrone	0:06:00	Billable	Send updated letter to team with notes for next steps
2/21/2019	Seth Packrone	0:48:00	Billable	Put in final edits to letter to Ds from J. LoCicero and proofread letter
2/21/2019	Seth Packrone	0:06:00	Billable	Send letter to Ds with note for Tuesday's settlement conference
2/21/2019	Seth Packrone	0:06:00	Billable	Correspond with co-counsel re: edits to letter to Ds
2/22/2019	Seth Packrone	0:06:00	Billable	Follow up with Defendants re: plan for Tuesday's settlement conference
2/22/2019	Seth Packrone	0:12:00	Billable	Send expert recommendation to team
2/22/2019	Seth Packrone	0:06:00	Billable	Begin reviewing settlement response from DOE
2/22/2019	Seth Packrone	0:12:00	Billable	Prep for Tuesday's settlement conference
2/23/2019	Seth Packrone	0:42:00	Billable	Read/take notes on DOE response in preparation for Tuesday's conference
2/24/2019	Seth Packrone	0:06:00	Billable	Correspond with co-counsel re: plan for following up with external monitor
2/25/2019	Michelle Caiola	0:12:00	Billable	update from SP re negotiations and next steps
2/25/2019	Seth Packrone	0:06:00	Billable	Correspond with opposing counsel re: call with external monitor candidate
2/25/2019	Seth Packrone	0:06:00	Billable	Follow up with M. Goodell re: analysis of DOE's response
2/25/2019	Seth Packrone	0:12:00	Billable	Update M. Caiola re: status of settlement negotiations
2/25/2019	Seth Packrone	0:06:00	Billable	Correspond with co-counsel re: plan for tomorrow's settlement negotiations
2/25/2019	Seth Packrone	0:06:00	Billable	Follow up with external expert and opposing counsel re: call to discuss timeline
2/25/2019	Seth Packrone	1:06:00	Billable	Prep for settlement conference with Defendants by reviewing DOE, DOC, and our responses
2/25/2019	Seth Packrone	0:12:00	Billable	Tc with co-counsel re: plan for settlement conference
2/25/2019	Seth Packrone	0:12:00	Billable	Correspond with potential external monitor

2/26/2019	Michelle Caiola	0:06:00	Billable	update from SP re mediation session outcome and next steps
2/26/2019	Seth Packrone	1:24:00	Billable	Travel to and from settlement conference at DNJ in Trenton (total was 2.8, bill half)
2/26/2019	Seth Packrone	0:30:00	Billable	Prep for settlement conference with defendants
2/26/2019	Seth Packrone	5:18:00	Billable	Settlement conference with Defendants at District of New Jersey in Trenton with J. LoCicero, E. Huertas, T. Borden, and A. Pollioni
2/26/2019	Seth Packrone	0:12:00	Billable	Send update about settlement conference to team
2/27/2019	Seth Packrone	0:06:00	Billable	correspond with potential external monitor re: availability
2/27/2019	Seth Packrone	0:06:00	Billable	Correspond with team re: status of potential external expert
2/27/2019	Seth Packrone	0:12:00	Billable	Draft email to potential external monitor re: questions from Judge
2/27/2019	Seth Packrone	0:06:00	Billable	Correspond with opposing counsel re: plan for reaching out to experts
2/27/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: plan for this week's call
2/28/2019	Michelle Caiola	0:06:00	Billable	update from SP re prison visits with AKO
2/28/2019	Seth Packrone	0:06:00	Billable	Correspond with Dr. Roberts re: update on external monitor situation
2/28/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: plan for call with potential external monitor
2/28/2019	Seth Packrone	0:30:00	Billable	Tc with P. Leahy re: settlement conference and letter response to DOE
2/28/2019	Seth Packrone	0:06:00	Billable	Tc with T. Borden re: next steps for external monitor situation
3/1/2019	Maia Goodell	0:30:00	Billable	strategy session with co-counsel re settlement, monitor candidates
3/1/2019	Maia Goodell	0:12:00	Billable	analysis of DOC and DOE settlement positions and plan for next steps with S.Packrone
3/1/2019	Michelle Caiola	0:30:00	Billable	strategy session with SP re current offer on table and potential other approaches and terms
3/1/2019	Seth Packrone	0:06:00	Billable	Follow up with internal team re: potential external expert
3/1/2019	Seth Packrone	0:12:00	Billable	Follow up with potential external monitor re: timeline
3/1/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: plan for NJPC call
3/1/2019	Seth Packrone	0:24:00	Billable	Update M. Caiola re: status of settlement and next steps
3/1/2019	Seth Packrone	0:42:00	Billable	tc with T. Borden and E. Huertas with NJPC (Kathy Wright) re: status of intakes from prisons
3/1/2019	Seth Packrone	0:06:00	Billable	Check in with P. Leahy re: DOE letter draft
3/1/2019	Seth Packrone	0:06:00	Billable	Give R. Moser instructions re: researching expert candidate
3/1/2019	Seth Packrone	0:12:00	Billable	Prep for tc with expert candidate
3/1/2019	Seth Packrone	0:42:00	Billable	Tc with co-counsel and expert candidate re: potential external monitor position
3/1/2019	Seth Packrone	0:06:00	Billable	Follow up strategy session with T. Borden re: next steps for external monitor candidate
3/1/2019	Seth Packrone	0:06:00	Billable	Review research on expert recommendation
3/1/2019	Seth Packrone	0:30:00	Billable	Tc with M. Goodell and P. Leahy re: next steps for case and plan for Monday's settlement conference
3/1/2019	Seth Packrone	0:12:00	Billable	Update M. Goodell re: status of settlement negotiations
3/1/2019	Seth Packrone	0:12:00	Billable	Propose expert candidate to Defendants
3/4/2019	Seth Packrone	0:06:00	Billable	Correspond with team re: plan for settlement conference
3/4/2019	Seth Packrone	0:12:00	Billable	Correspond with P. Leahy re: plan for proposing external monitors and next steps for DOE letter
3/4/2019	Seth Packrone	0:12:00	Billable	Correspond with T. Borden re: status of next settlement conference and follow up about client
3/4/2019	Seth Packrone	0:12:00	Billable	Tc with P. Leahy re: status of the letter to the DOE and next steps
3/5/2019	Seth Packrone	0:18:00	Billable	Review notes from settlement conference and status of DOE response letter and follow up with team re: same
3/5/2019	Seth Packrone	0:12:00	Billable	Review propose list of violations to qualify for MDs
3/5/2019	Seth Packrone	0:06:00	Billable	Follow up with T. Borden re: thoughts on MD violation list

3/5/2019	Seth Packrone	0:12:00	Billable	Review background information on potential expert and follow up with team re: same
3/5/2019	Seth Packrone	0:06:00	Billable	correspond with team re: next steps for settlement conference with Defendants
3/6/2019	Maia Goodell	0:24:00	Billable	strategy for response to defendants in light of refusal to commit to written agreement for next steps in settlement process
3/6/2019	Seth Packrone	0:30:00	Billable	Review/analyze DOE's 2/22 response and compare to our last request
3/6/2019	Seth Packrone	0:30:00	Billable	Tc with P. Leahy re: next steps for drafting letter response to DOE
3/6/2019	Seth Packrone	1:18:00	Billable	Draft response to DOE 2/22 proposal pp. 1-11
3/6/2019	Seth Packrone	0:42:00	Billable	Draft/revise sections II-IV of DOE letter
3/6/2019	Seth Packrone	0:18:00	Billable	Update M. Goodell re: status of DOE letter
3/7/2019	Seth Packrone	0:42:00	Billable	Edit/finalize first draft of response to DOE
3/7/2019	Seth Packrone	0:18:00	Billable	Review/revise P. Leahy's comments for edits to the letter
3/7/2019	Seth Packrone	0:06:00	Billable	Draft short summary of letter to team with notes for things to look for
3/7/2019	Seth Packrone	0:12:00	Billable	Correspond with team re: plan for getting draft letter out to Defendants
3/7/2019	Seth Packrone	0:06:00	Billable	Review DOE letter and make further edits
3/7/2019	Seth Packrone	0:06:00	Billable	Prep for call with team re: issues to address
3/7/2019	Seth Packrone	0:06:00	Billable	Review notes on DOE response to consider making edits to the DOE letter
3/7/2019	Seth Packrone	0:24:00	Billable	Tc with team (P. Leahy, T. Borden, E. Huertas, A. Pollioni, and C. Bowman) re: next steps for DOE letter
3/7/2019	Seth Packrone	0:06:00	Billable	Check in with K. Anderson re: call about Adam X.
3/11/2019	Michelle Caiola	0:06:00	Billable	update from SP re next steps and assignment
3/11/2019	Seth Packrone	0:12:00	Billable	Correspond with T. Borden re; status of response to DOE
3/11/2019	Seth Packrone	0:06:00	Billable	Review letter edits from co-counsel
3/11/2019	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: edits to DOE letter
3/11/2019	Seth Packrone	0:30:00	Billable	Revise letter to DOE
3/11/2019	Seth Packrone	0:06:00	Billable	Correspond with team re: edits to DOE response
3/11/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: finalizing letter to DOE
3/11/2019	Seth Packrone	0:06:00	Billable	Review DOE response
3/11/2019	Seth Packrone	0:06:00	Billable	Correspond with P. Leahy re: reviewing DOE response
3/11/2019	Seth Packrone	0:06:00	Billable	Update M. Caiola re: status of settlement
3/12/2019	Seth Packrone	0:06:00	Billable	Check in with T. Borden re: plan for call
3/12/2019	Seth Packrone	0:42:00	Billable	Calls with T. Borden and E. Huertas re: issues in DOC facilities
3/12/2019	Seth Packrone	0:12:00	Billable	TC with M. Caiola re: issues in DOC facilities
3/12/2019	Seth Packrone	0:12:00	Billable	Prep for Thursday's all day settlement conference
3/12/2019	Seth Packrone	0:18:00	Billable	Prep for tomorrow's settlement conference with DOC
3/12/2019	Seth Packrone	0:06:00	Billable	Tc with P. Leahy re: comparing DOE response to our requests
3/12/2019	Seth Packrone	0:42:00	Billable	Tc with T. Borden and A. Pollioni re: next steps for case and plan for settlement conference
3/12/2019	Seth Packrone	0:30:00	Billable	Review DOE response in preparation for Thursday's settlement conference
3/12/2019	Seth Packrone	0:06:00	Billable	Follow up with M. Goodell re: plan for Thursday's settlement conference
3/13/2019	Maia Goodell	0:18:00	Billable	analysis of DOC settlement response and plan for potential consulting expert
3/13/2019	Maia Goodell	0:12:00	Billable	legal research re communications with witnesses
3/13/2019	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: plan for settlement

3/13/2019	Seth Packrone	0:06:00	Billable	Give R. Moser instructions re: materials for settlement conference
3/13/2019	Seth Packrone	0:06:00	Billable	Check in with P. Leahy re: status of review of DOE letter draft
3/13/2019	Seth Packrone	1:36:00	Billable	Settlement teleconference with DOC with T. Borden, E. Huertas, and A. Pollioni
3/13/2019	Seth Packrone	0:12:00	Billable	Update M. Goodell re: next steps for settlement discussions
3/13/2019	Seth Packrone	0:06:00	Billable	Follow up with T. Borden re: plan for tomorrow's settlement conference
3/14/2019	Maia Goodell	0:06:00	Billable	review summary of recent settlement conference and analysis of settlement position
3/14/2019	Seth Packrone	1:30:00	Billable	Travel to and from settlement conference at DNJ (bill half, total was 3)
3/14/2019	Seth Packrone	3:54:00	Billable	Settlement meeting with Defendants (with J. LoCicero, T. Borden, E. Huertas, and A. Pollioni) at DNJ
3/14/2019	Seth Packrone	0:18:00	Billable	Debrief with Judge Goodman
3/14/2019	Seth Packrone	0:18:00	Billable	Update team re: results of settlement conference
3/15/2019	Seth Packrone	0:12:00	Billable	Correspond with T. Borden re: next steps for settlement and expert outreach
3/18/2019	Maia Goodell	0:12:00	Billable	plan for upcoming settlement conferences
3/18/2019	Seth Packrone	0:12:00	Billable	Update M. Goodell re: results of last settlement conference and next steps for settlement
3/18/2019	Seth Packrone	0:48:00	Billable	Tc with T. Borden re: plan for responses/settlement draft moving forward
3/18/2019	Seth Packrone	0:18:00	Billable	Review P. Leahy's summary of DOE response and correspond with T. Borden re: same
3/18/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: follow up about expert
3/19/2019	Seth Packrone	0:06:00	Billable	Tc with T. Borden re: plan for call with ACLU-LA about education experts
3/19/2019	Seth Packrone	0:30:00	Billable	Tc with T. Borden and ACLU-LA re: independent expert candidate
3/19/2019	Seth Packrone	0:06:00	Billable	Tc with T. Borden re: follow up
3/20/2019	Seth Packrone	0:42:00	Billable	Review Defendants' latest response, outline response, and create agenda for settlement conference
3/20/2019	Seth Packrone	0:06:00	Billable	Correspond with M. Goodell re: call with potential expert
3/20/2019	Seth Packrone	0:36:00	Billable	Tc with potential joint expert and T. Borden
3/20/2019	Seth Packrone	0:06:00	Billable	Tc with T. Borden re: plan for call with potential joint expert
3/20/2019	Seth Packrone	0:06:00	Billable	Tc with T. Borden re: debrief call with potential joint expert
3/20/2019	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: plan for tomorrow's settlement conference
3/21/2019	Michelle Caiola	0:18:00	Billable	Discuss further strategy and staffing with MG
3/21/2019	Seth Packrone	0:06:00	Billable	Draft shortened agenda for defendants
3/21/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: agenda for call with Defendants
3/21/2019	Seth Packrone	0:06:00	Billable	Correspond with Defendants re: plan for today's call
3/21/2019	Seth Packrone	0:48:00	Billable	Tc with T. Borden re: manifestation determinations proposal and plan for today's call
3/21/2019	Seth Packrone	0:06:00	Billable	Review T. Borden's manifestation determination proposal
3/21/2019	Seth Packrone	0:30:00	Billable	Prep for settlement conference by reviewing DOC's policies and settlement communications
3/21/2019	Seth Packrone	1:30:00	Billable	Settlement conference with Defendants and T. Borden, E. Huertas, and A. Pollioni
3/21/2019	Seth Packrone	0:24:00	Billable	Tc with T. Borden re: next steps for prepping letters and settlement documents
3/21/2019	Seth Packrone	0:06:00	Billable	Update M. Goodell re: status of Adam X. settlement discussions
3/21/2019	Seth Packrone	0:06:00	Billable	Correspond with potential monitor re: follow up with DOC
3/22/2019	Michelle Caiola	0:12:00	Billable	confer with S Packrone re status of negotiations and getting next steps done
3/22/2019	Seth Packrone	0:06:00	Billable	Correspond with external expert re: update on her anticipated timeline
3/22/2019	Seth Packrone	0:12:00	Billable	Review notes from last settlement conferences to prep to write response to DOC

3/22/2019	Seth Packrone	0:12:00	Billable	Check in with M. Caiola re: status of settlement and staffing moving forward
3/22/2019	Seth Packrone	0:06:00	Billable	Check in with T. Borden and M. Vomacka re: plan for following up with expert
3/22/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: following up with expert with queswtions
3/22/2019	Seth Packrone	0:06:00	Billable	Tc with T. Zito re: manifestation determinations in prison
3/22/2019	Seth Packrone	0:18:00	Billable	Research issue of translating IEPs
3/22/2019	Seth Packrone	0:06:00	Billable	Draft section on translating IEPs
3/22/2019	Seth Packrone	0:48:00	Billable	Review/analyze policies and draft response to DOC
3/23/2019	Seth Packrone	0:54:00	Billable	Review policies/finish draft of DOC response
3/23/2019	Seth Packrone	0:24:00	Billable	Revise/edit first draft of DOC response
3/23/2019	Seth Packrone	0:06:00	Billable	Send DOC response to T. Borden and M. Goodell with notes for next steps
3/25/2019	Maia Goodell	0:30:00	Billable	review additional response to DOC re settlement; analysis of manifestation determination proposal
3/25/2019	Michelle Caiola	0:06:00	Billable	update re newly available expert from MG
3/25/2019	Seth Packrone	0:06:00	Billable	Correspond with opposing counsel and potential expert re; timing for starting work
3/25/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden and M. Goodell re: next steps for settlement
3/25/2019	Seth Packrone	0:12:00	Billable	Review T. Borden's edits to DOC resposne
3/25/2019	Seth Packrone	0:18:00	Billable	Review A. Pollioni settlement draft
3/25/2019	Seth Packrone	0:36:00	Billable	Work session with T. Borden to edit DOC response
3/25/2019	Seth Packrone	0:18:00	Billable	Strategy session with T. Borden re: proposal for joint expert
3/25/2019	Seth Packrone	3:30:00	Billable	Work session with T. Borden re: outline and draft of settlement agreement
3/25/2019	Seth Packrone	0:06:00	Billable	Follow up with opposing counsel re: external monitor proposal
3/26/2019	Seth Packrone	0:12:00	Billable	Correspond with T. Borden, opposing counsel and potential expert candidates re: status of settlement negotiations
3/26/2019	Seth Packrone	0:48:00	Billable	Review/analyze take notes on DOE Monitoring Tool and crosswalk
3/26/2019	Seth Packrone	0:30:00	Billable	Edit DOE letter and send back to T. Borden with notes for next steps
3/26/2019	Seth Packrone	0:18:00	Billable	Draft list of additions to DOE letter based on review of DOE response and our last letter to them
3/26/2019	Seth Packrone	0:12:00	Billable	Edit DOC letter about transition services
3/26/2019	Seth Packrone	0:36:00	Billable	Tc with T. Borden re: edits to DOE letter
3/26/2019	Seth Packrone	0:12:00	Billable	Edit DOE letter based on T. Borden's edits
3/26/2019	Seth Packrone	0:06:00	Billable	Send DOE letter to team
3/27/2019	Maia Goodell	0:24:00	Billable	review and supplement response to DOE re monitoring tool
3/27/2019	Maia Goodell	0:24:00	Billable	strategy session with S.Packrone re expert, settlement strategy
3/27/2019	Seth Packrone	0:06:00	Billable	Review M. Goodell's comments to DOE response
3/27/2019	Seth Packrone	0:24:00	Billable	Strategy session with M. Goodell re: edits/comments to DOE letter
3/27/2019	Seth Packrone	0:12:00	Billable	Edit letter to DOE
3/27/2019	Seth Packrone	0:06:00	Billable	Tc with T. Borden re: next steps for letters
3/27/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: status of letters to Defendants and MG's edits
3/27/2019	Seth Packrone	0:06:00	Billable	Follow up with opposing counsel re: joint expert call
3/28/2019	Maia Goodell	0:30:00	Billable	call with J.LoCicero re upcoming settlement meetings
3/29/2019	Maia Goodell	0:18:00	Billable	review and analyze DOE letter re monitoring process proposal
3/29/2019	Seth Packrone	0:06:00	Billable	Edit DOE letter

3/29/2019	Seth Packrone	0:06:00	Billable	Edit DOC letter
3/29/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: edits to DOC/DOE letters
3/29/2019	Seth Packrone	0:12:00	Billable	Review new DOE letter
3/29/2019	Seth Packrone	0:06:00	Billable	Tc with T. Borden re: edits to DOC/DOE letter
4/1/2019	Seth Packrone	0:06:00	Billable	Review correspondence with T. Borden and opposing counsel re: responses to DOC/DOE
4/2/2019	Seth Packrone	0:06:00	Billable	Correspond with potential joint expert re: next steps
4/3/2019	Andrea KO	0:48:00	Billable	Review background case materials.
4/3/2019	Andrea KO	0:24:00	Billable	Team strategy call re: settlement.
4/3/2019	Maia Goodell	0:30:00	Billable	strategy session with co-counsel re preparation for settlement conference
4/3/2019	Seth Packrone	0:12:00	Billable	Tc with client's family member re: update on situation
4/3/2019	Seth Packrone	0:06:00	Billable	Update T. Borden on client's situation
4/3/2019	Seth Packrone	0:18:00	Billable	Prep for tomorrow's settlement conference
4/3/2019	Seth Packrone	0:06:00	Billable	Tc with T. Borden re: prep for call with joint expert
4/3/2019	Seth Packrone	0:30:00	Billable	Tc with joint expert, T. Borden, and Defendants
4/3/2019	Seth Packrone	0:18:00	Billable	Follow up tc with T. Borden re: next steps for case
4/3/2019	Seth Packrone	0:12:00	Billable	Draft agenda for settlement conference
4/3/2019	Seth Packrone	0:36:00	Billable	Tc with team (T. Borden, M. Goodell, and A. Pollioni) re: plan for settlement conference
4/3/2019	Seth Packrone	0:06:00	Billable	Follow up tc with T. Borden re: plan for drafting settlement
4/3/2019	Seth Packrone	0:06:00	Billable	Send agenda to opposing counsel
4/4/2019	Maia Goodell	0:48:00	Billable	meeting with ACLU re strategy for settlement conference and recent retaliation against client
4/4/2019	Maia Goodell	0:18:00	Billable	review communication from opposing counsel re refusal to respond to MOU and communication from ADA re same
4/4/2019	Maia Goodell	0:30:00	Billable	meeting with co-counsel re next steps following settlement conference
4/4/2019	Seth Packrone	0:24:00	Billable	Prep for settlement conference by reviewing most recent letters
4/4/2019	Seth Packrone	1:30:00	Billable	Travel to and from settlement conference in Trenton (total 3.1, bill half)
4/4/2019	Seth Packrone	4:18:00	Billable	Settlement conference with with Defendants T. Borden, M. Goodell, A. Pollioni, and E. Huertas
4/4/2019	Seth Packrone	0:18:00	Billable	Debrief with team
4/4/2019	Seth Packrone	0:06:00	Billable	correspond with opposing counsel re: timing for call with joint expert
4/5/2019	Andrea KO	0:12:00	Billable	Prepare for work session with S. Packrone and T. Borden by reviewing most recent draft
4/5/2019	Andrea KO	2:24:00	Billable	Telephonic work session with S. Packrone and T. Borden re: settlement agreement draft.
4/5/2019	Michelle Caiola	0:12:00	Billable	update from SP re yesterday's session
4/5/2019	Seth Packrone	2:24:00	Billable	Work session with AKO and T. Borden re: drafting settlement agreement
4/5/2019	Seth Packrone	0:06:00	Billable	Update M. Caiola re: settlement conference
4/5/2019	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: next steps for expert
4/8/2019	Andrea KO	1:24:00	Billable	Draft settlement agreement.
4/8/2019	Seth Packrone	0:06:00	Billable	Tc with DOC facility re: client call
4/8/2019	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: plan for follow up with joint experts
4/8/2019	Seth Packrone	0:42:00	Billable	Tc with T. Borden and client, Brian Y re: update on situation
4/8/2019	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: follow up with Defendants
4/8/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re; draft email to Defendants about retaliation

4/8/2019	Seth Packrone	0:06:00	Billable	Follow up with team re: retaliation emails
4/8/2019	Seth Packrone	0:06:00	Billable	Correspond with joint expert re: next steps for monitoring period
4/9/2019	Andrea KO	4:12:00	Billable	Draft remaining settlement agreement provisions
4/10/2019	Seth Packrone	0:06:00	Billable	Review joint expert fee proposal and send to team
4/11/2019	Andrea KO	0:06:00	Billable	Discuss settlement strategy with S. Packrone.
4/11/2019	Andrea KO	0:12:00	Billable	Team strategy call re: settlement.
4/11/2019	Maia Goodell	0:12:00	Billable	strategy for expert call with S.Packrone
4/11/2019	Maia Goodell	0:12:00	Billable	review report of call with monitor and provide direction re next steps
4/11/2019	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: plan for call with monitor
4/11/2019	Seth Packrone	0:06:00	Billable	Review records from opposing counsel re: disciplinary issues with client
4/11/2019	Seth Packrone	0:06:00	Billable	Check in with AKO re: status of settlement draft
4/11/2019	Seth Packrone	0:06:00	Billable	Follow up with T. Borden re: plan for today's call with monitor and contact from client
4/11/2019	Seth Packrone	0:06:00	Billable	Prep for call with joint monitor
4/11/2019	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: plan for call with external monitor
4/11/2019	Seth Packrone	0:18:00	Billable	Tc with T. Borden and Ds' counsel re: call with monitor (re: fees and plan for call)
4/11/2019	Seth Packrone	0:12:00	Billable	Tc with T. Borden, Ds' counsel, and external monitor re: next steps for her role in the case
4/11/2019	Seth Packrone	0:18:00	Billable	Follow up tc with T. Borden re: next steps for court appointment of joint monitor and drafting settlement agreement
4/11/2019	Seth Packrone	0:12:00	Billable	Tc with AKO, T. Borden, and C. Bowman re: update on case and next steps
4/11/2019	Seth Packrone	0:12:00	Billable	Check in with M. Goodell re: Ds' position on covering monitors' fees/costs
4/12/2019	Andrea KO	0:06:00	Billable	Discuss settlement draft revisions with S. Packrone.
4/12/2019	Seth Packrone	0:54:00	Billable	Review/edit settlement draft from T. Borden
4/12/2019	Seth Packrone	0:06:00	Billable	Check in with AKO and T. Borden re: plan to edit settlement agreement
4/12/2019	Seth Packrone	0:24:00	Billable	Tc with T. Borden and client, Arc of NJ re: update on case
4/12/2019	Seth Packrone	0:06:00	Billable	Strategy session with AKO re: edits to settlement agreement
4/12/2019	Seth Packrone	0:24:00	Billable	Strategy session with AKO re: settlement draft and co-counsel's edits
4/12/2019	Seth Packrone	0:06:00	Billable	Tc with T. Borden and potential expert re: update on external monitoring process
4/15/2019	Andrea KO	0:36:00	Billable	Review edits to settlement agreement draft.
4/15/2019	Seth Packrone	0:06:00	Billable	Follow up with E. Huertas and R. Moser re: setting up a visit with client
4/15/2019	Seth Packrone	1:30:00	Billable	Revise/edit first draft of settlement agreement
4/15/2019	Seth Packrone	0:36:00	Billable	Add sections about comp ed and DOE monitoring
4/15/2019	Seth Packrone	0:06:00	Billable	Follow up with R. Moser re: plan for visit request sent to Wagner
4/15/2019	Seth Packrone	0:54:00	Billable	Review/edit first of settlement agreement with all comments/redlining
4/15/2019	Seth Packrone	0:06:00	Billable	Correspond with AKO and T. Borden re: update on settlement agreement draft and next steps
4/16/2019	Andrea KO	0:12:00	Billable	Review S. Packrone's revisions to settlement agreement draft.
4/16/2019	Andrea KO	1:30:00	Billable	Work session with S. Packrone and T. Borden re: settlement agreement draft.
4/16/2019	Seth Packrone	0:06:00	Billable	Tc with AKO re: plan for call with T. Borden about settlement agreement
4/16/2019	Seth Packrone	0:06:00	Billable	Review comp ed email from co-counsel
4/16/2019	Seth Packrone	1:30:00	Billable	Tc with T. Borden and AKO re: work session to continue to draft settlement agreement
4/17/2019	Andrea KO	3:36:00	Billable	Revise draft settlement agreement in advance of upcoming settlement conference

4/17/2019	Maia Goodell	0:24:00	Billable	strategy session with S.Packrone re upcoming settlement conference
4/17/2019	Seth Packrone	0:06:00	Billable	Prep for tomorrow's settlement conference
4/17/2019	Seth Packrone	0:18:00	Billable	Check in with M. Goodell re: plan for tomorrow's settlement conference
4/17/2019	Seth Packrone	0:18:00	Billable	Review DOE 4/16/19 response
4/17/2019	Seth Packrone	0:54:00	Billable	Tc with T. Borden re: agenda and plan for tomorrow's settlement conference
4/17/2019	Seth Packrone	0:30:00	Billable	Tc with T. Borden re: next steps for finalizing first draft of settlement agreement
4/17/2019	Seth Packrone	0:06:00	Billable	Follow up with AKO re: edits to make to settlement agreement
4/17/2019	Seth Packrone	0:06:00	Billable	Prep for settlement conference
4/17/2019	Seth Packrone	0:12:00	Billable	Strategy session with AKO re: finalizing edits to settlement agreement
4/17/2019	Seth Packrone	0:06:00	Billable	Prep for settlement conference by reviewing most recent correspondence between the parties
4/18/2019	Maia Goodell	0:30:00	Billable	prep for settlement conference - review agenda, analyze DOE response letter
4/18/2019	Maia Goodell	0:30:00	Billable	strategy session with S.Packrone re upcoming settlement conference, class settlement, settlement agreement planning
4/18/2019	Maia Goodell	0:42:00	Billable	travel from NYC to Trenton for settlement conference (total 1.5; bill half)
4/18/2019	Maia Goodell	2:24:00	Billable	settlement conference
4/18/2019	Maia Goodell	0:24:00	Billable	travel from Trenton to NYC after settlement conference (total 1.5; bill half minus time worked)
4/18/2019	Seth Packrone	0:42:00	Billable	Travel to DNJ for settlement conference from Jersey City (total was 1.5, bill half)
4/18/2019	Seth Packrone	3:00:00	Billable	Processing/settlement conference with Defendants with M. Goodell, E. Huertas, and T. Borden
4/18/2019	Seth Packrone	0:06:00	Billable	Travel from DNJ to DOC facility for client visit (total was 20 minutes, bill half)
4/18/2019	Seth Packrone	1:18:00	Billable	Processing/visit with client
4/18/2019	Seth Packrone	1:48:00	Billable	Wait at DOC facility because of power outage in the middle of client visit - unable to leave facility because it was on lockdown from approximately 2:45 to 4:35
4/18/2019	Seth Packrone	0:36:00	Billable	Travel back to Jersey City from DOC facility after client visit (total was 1.2, bill half)
4/18/2019	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: prep for client visit
4/18/2019	Seth Packrone	0:12:00	Billable	Strategy session with E. Huertas re: plan for client visit
4/19/2019	Andrea KO	0:30:00	Billable	Work session with S. Packrone and T. Borden re: settlement agreement draft.
4/19/2019	Seth Packrone	0:42:00	Billable	Review/edit AKO's draft of settlement agreement
4/19/2019	Seth Packrone	0:30:00	Billable	Tc with T. Borden and AKO re: work session to finalize first draft of settlement
4/19/2019	Seth Packrone	0:06:00	Billable	Follow up with joint monitor candidates
4/19/2019	Seth Packrone	0:06:00	Billable	Tc with potential expert re: decision on external monitor
4/22/2019	Maia Goodell	0:24:00	Billable	analysis of scope of release for settlement agreement
4/22/2019	Seth Packrone	0:06:00	Billable	Prep case work for the week
4/22/2019	Seth Packrone	0:12:00	Billable	Give AKO instructions re: drafting consent order for external monitor
4/22/2019	Seth Packrone	0:06:00	Billable	Follow up with Defendants re: sign in sheet and case law
4/22/2019	Seth Packrone	0:06:00	Billable	Review case law re: language access
4/22/2019	Seth Packrone	0:06:00	Billable	Follow up with T. Borden re: interview questions and consent order
4/22/2019	Seth Packrone	0:12:00	Billable	Revise student interview questions and send to T. Borden
4/22/2019	Seth Packrone	0:06:00	Billable	Follow up with joint expert candidate
4/22/2019	Seth Packrone	0:18:00	Billable	Review expert report from juvenile facility case re: ADA accommodations/modifications
4/22/2019	Seth Packrone	0:06:00	Billable	Follow up with M. Goodell re: reasonable accommodations in settlement agreement
4/23/2019	Andrea KO	1:06:00	Billable	Draft consent decree re: external monitor

4/23/2019	Maia Goodell	0:54:00	Billable	review and supplement draft settlement agreement
4/23/2019	Maia Goodell	0:54:00	Billable	review settlement agreement and strategy for scope of covered claims and release with S.Packrone
4/23/2019	Maia Goodell	0:36:00	Billable	legal research re ethical restrictions on agreements not to represent clients to respond to DOE request
4/23/2019	Seth Packrone	0:54:00	Billable	Tc with M. Goodell re: work session on settlement agreement
4/23/2019	Seth Packrone	0:30:00	Billable	Edit consent order draft to appoint Roberts as external monitor
4/23/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden and E. Huertas re: consent order
4/23/2019	Seth Packrone	0:12:00	Billable	Review/edit interview questions for students
4/23/2019	Seth Packrone	0:18:00	Billable	Review/edit settlement agreement based on initial settlement demand
4/23/2019	Seth Packrone	0:30:00	Billable	Edit settlement agreement draft based on M. Goodell's comments/edits
4/23/2019	Seth Packrone	0:12:00	Billable	Review UPL case law and follow up with Defendants re: same
4/23/2019	Seth Packrone	0:06:00	Billable	Correspond with M. Goodell re: proposed release language
4/24/2019	Seth Packrone	0:12:00	Billable	Review/compile MG's edits to settlement agreement
4/24/2019	Seth Packrone	0:06:00	Billable	Review settlement file to write CAP section of settlement
4/24/2019	Seth Packrone	0:30:00	Billable	Review DOE 4/16/19 response to write CAP section of settlement draft
4/24/2019	Seth Packrone	0:24:00	Billable	Draft CAP section of settlement draft based on 4/16/19 response from DOE
4/24/2019	Seth Packrone	0:12:00	Billable	Send T. Borden update re: status of settlement and next steps
4/24/2019	Seth Packrone	0:06:00	Billable	Edit release language and send to T. Borden
4/29/2019	Seth Packrone	0:06:00	Billable	Review correspondence with team
4/30/2019	Maia Goodell	0:06:00	Billable	review court stipulation
4/30/2019	Seth Packrone	0:06:00	Billable	Follow up with M. Goodell re: next steps for revising settlement agreement/order
4/30/2019	Seth Packrone	0:06:00	Billable	Review co-counsel's edits to settlement agreement
4/30/2019	Seth Packrone	0:30:00	Billable	Tc with T. Borden re: status of consent order and settlement agreement and next steps for getting documents to Defendants
4/30/2019	Seth Packrone	0:06:00	Billable	Review T. Borden's edits to consent order and send consent order draft to M. Goodell for her review
5/1/2019	Michelle Caiola	0:06:00	Billable	status update from SP
5/1/2019	Seth Packrone	0:12:00	Billable	Draft follow up email to opposing counsel re: outstanding information requests
5/1/2019	Seth Packrone	0:06:00	Billable	Update M. Caiola re: status of settlement negotiations
5/1/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden and Defendants re: timeline for expert's review of policies and monitoring tool
5/2/2019	Andrea KO	0:12:00	Billable	Emails with S. Packrone re: revisions to Adam X settlement agreement.
5/2/2019	Michelle Caiola	0:24:00	Billable	review settlement agreement - t/c with SP re potential conflict with release
5/2/2019	Michelle Caiola	0:12:00	Billable	review case re Prisoner Reform Act re: jurisdiction
5/2/2019	Seth Packrone	0:06:00	Billable	Follow up with team (AKO/MG) re: edits to settlement agreement
5/2/2019	Seth Packrone	0:12:00	Billable	Review/analyze edits to settlement agreement
5/2/2019	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: next steps for settlement agreement
5/2/2019	Seth Packrone	0:06:00	Billable	Check in with M. Caiola re: plan for settlement agreement
5/2/2019	Seth Packrone	0:06:00	Billable	Correspond with Defendants and expert
5/3/2019	Seth Packrone	0:06:00	Billable	Correspond with joint expert re: next steps
5/6/2019	Maia Goodell	0:12:00	Billable	communication with co-counsel re upcoming settlement work division
5/6/2019	Maia Goodell	0:12:00	Billable	communication with co-counsel re upcoming settlement work division
5/6/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden and M. Goodell re: plan for consent order and staffing call

5/6/2019	Seth Packrone	0:12:00	Billable	Review latest draft of consent order and correspond with T. Borden re: same
5/6/2019	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: status of consent order and next steps for sharing with Defendants
5/6/2019	Seth Packrone	0:12:00	Billable	Case planning for next steps in settlement and negotiations
5/6/2019	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: status of consent order and staffing call
5/6/2019	Seth Packrone	1:00:00	Billable	Work session with T. Borden re: new draft of settlement agreement
5/6/2019	Seth Packrone	0:06:00	Billable	Draft cover email to send to team re: next steps for settlement agreement
5/6/2019	Seth Packrone	0:54:00	Billable	Edit settlement agreement based on T. Borden's edits/comments
5/7/2019	Andrea KO	0:06:00	Billable	Discuss settlement agreement revisions with S. Packrone.
5/7/2019	Andrea KO	0:06:00	Billable	Review settlement agreement revisions.
5/7/2019	Seth Packrone	0:06:00	Billable	Correspond with M. Goodell re: next steps for staffing call and update on rates for expert
5/7/2019	Seth Packrone	0:06:00	Billable	Check in with AKO re: status of settlement agreement
5/7/2019	Seth Packrone	0:24:00	Billable	Tc with T. Borden re: next steps for settlement
5/8/2019	Andrea KO	0:48:00	Billable	Review and revise settlement agreement draft.
5/8/2019	Andrea KO	1:00:00	Billable	Review recently received documents from DOC.
5/8/2019	Seth Packrone	0:06:00	Billable	Check in with AKO re: status of settlement draft
5/8/2019	Seth Packrone	0:06:00	Billable	Follow up with opposing counsel's emails
5/8/2019	Seth Packrone	0:36:00	Billable	Review/edit final version of settlement agreement
5/8/2019	Seth Packrone	0:24:00	Billable	Tc with T. Borden re: plan for responding to OC and finalizing draft of settlement agreement
5/9/2019	Andrea KO	0:30:00	Billable	Further review of recently received documents from DOC.
5/9/2019	Maia Goodell	0:12:00	Billable	prepare for settlement conference - review communications with opposing counsel re conference attendance, fee questions
5/9/2019	Maia Goodell	0:12:00	Billable	prepare for settlement conference - review communications with opposing counsel re conference attendance, fee questions
5/9/2019	Seth Packrone	0:06:00	Billable	Correspond with team re: plan for sending settlement agreement to Defendants
5/9/2019	Seth Packrone	0:06:00	Billable	Correspond with M. Goodell re: plan for Tuesday's settlement conference
5/10/2019	Seth Packrone	0:06:00	Billable	Check in with expert consultant re: status of case
5/10/2019	Seth Packrone	0:06:00	Billable	Start to review policy documents from Defendants
5/10/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: plan for call with joint expert and opposing counsel
5/10/2019	Seth Packrone	0:18:00	Billable	Tc with K. Duran, M. Vomacka and S. Davies re: plan for Tuesday
5/10/2019	Seth Packrone	0:12:00	Billable	Tc with external monitor, T. Borden, and opposing counsel re: next steps for her role
5/10/2019	Seth Packrone	0:24:00	Billable	Tc with T. Borden re: agenda for Tuesday's settlement conference
5/10/2019	Seth Packrone	0:06:00	Billable	send agenda to opposing counsel for Tuesday's settlement conference
5/13/2019	Seth Packrone	0:24:00	Billable	Prep for settlement conference by reviewing student interviews/other relevant documents
5/13/2019	Seth Packrone	0:30:00	Billable	Review/write questions about DOC policies/info about staffing given on 5.8.2019
5/13/2019	Seth Packrone	0:30:00	Billable	Review/write questions about DOC policies/info, Att. B-D given on 5.8.2019 (MD policy, procedural due process rights, and spec ed audit)
5/13/2019	Seth Packrone	0:18:00	Billable	Review/write questions about DOC policies/info in Att. E re: student records and associated NJAC provision given on 5.8.2019
5/13/2019	Seth Packrone	0:18:00	Billable	Review/write questions about DOC policies/info in Att. F-J (make up classes, teacher training) from May 8, 2019 submission
5/13/2019	Seth Packrone	0:42:00	Billable	Compile notes/questions on May 8, 2019 documents to prep for 5/14 settlement conference
5/13/2019	Seth Packrone	0:06:00	Billable	Correspond with team re: notes and plan for settlement conference
5/14/2019	Maia Goodell	0:30:00	Billable	strategy session re DOC policy drafts to prepare for court settlement conference with S.Packrone and co-counsel
5/14/2019	Maia Goodell	0:12:00	Billable	review S.Packrone memo re DOC policy questions for settlement conference

5/14/2019	Maia Goodell	2:00:00	Billable	court settlement conference (time reduced for work on other matters)
5/14/2019	Maia Goodell	1:00:00	Billable	travel to Trenton for in-court settlement conference (2 hours total; billed half)
5/14/2019	Maia Goodell	1:00:00	Billable	travel from Trenton to office after in-court settlement conference (2 hours total; billed half)
5/14/2019	Maia Goodell	0:30:00	Billable	strategy session re DOC policy drafts to prepare for court settlement conference with S.Packrone and co-counsel
5/14/2019	Maia Goodell	0:12:00	Billable	review S.Packrone memo re DOC policy questions for settlement conference
5/14/2019	Seth Packrone	0:36:00	Billable	Travel to settlement meeting at DNJ in Trenton (total was 1.3, bill half)
5/14/2019	Seth Packrone	3:48:00	Billable	Attend settlement conference at DNJ with DOC/DOE
5/14/2019	Seth Packrone	0:36:00	Billable	Travel home from settlement meeting at DNJ in Trenton (total was 1.2, bill half)
5/14/2019	Seth Packrone	0:12:00	Billable	Debrief settlement conference with team
5/15/2019	Maia Goodell	0:24:00	Billable	strategy session with S.Packrone re class certification for settlement
5/15/2019	Maia Goodell	0:06:00	Billable	communication with co-counsel re strategy for class certification for settlement
5/15/2019	Maia Goodell	0:12:00	Billable	call with J.LoCicero re class certification, plan for settlement
5/15/2019	Maia Goodell	0:24:00	Billable	strategy session with S.Packrone re class certification for settlement
5/15/2019	Maia Goodell	0:06:00	Billable	communication with co-counsel re strategy for class certification for settlement
5/15/2019	Maia Goodell	0:12:00	Billable	call with J.LeCicero re class certification, plan for settlement
5/15/2019	Michelle Caiola	0:06:00	Billable	status update from SP re negotiations
5/15/2019	Michelle Caiola	0:06:00	Billable	confer with MG re outside monitor issue that arose in negotiations
5/15/2019	Seth Packrone	0:24:00	Billable	Check in with M. Goodell re: next steps for negotiations and class cert status
5/15/2019	Seth Packrone	0:36:00	Billable	Draft follow up from settlement conference with our positions on latest policies
5/15/2019	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: status of class cert issue
5/16/2019	Seth Packrone	0:12:00	Billable	Revise response to Ds based on T. Borden's comments after settlement conference and send
5/16/2019	Seth Packrone	0:06:00	Billable	Tc with with T. Borden re: site visits with external monitor
5/16/2019	Seth Packrone	0:06:00	Billable	Review Ds' redrafted student interview questions
5/16/2019	Seth Packrone	0:24:00	Billable	Review new version of DOE monitoring tool
5/16/2019	Seth Packrone	0:12:00	Billable	Draft response to Ds and T. Borden re: DOE monitoring tool
5/16/2019	Seth Packrone	0:12:00	Billable	Review new draft of consent order with Ds' edits and look up legal provision they cited
5/16/2019	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: Ds' edits to consent order
5/16/2019	Seth Packrone	0:06:00	Billable	Follow up with T. Borden re: Ds' edits to consent order
5/17/2019	Maia Goodell	0:24:00	Billable	call with co-counsel re strategy for workload division
5/17/2019	Maia Goodell	0:06:00	Billable	analysis of next steps for settlement
5/17/2019	Maia Goodell	0:12:00	Billable	review communication from opposing counsel re assessment plan and monitor
5/17/2019	Maia Goodell	0:24:00	Billable	call with co-counsel re strategy for workload division
5/17/2019	Maia Goodell	0:06:00	Billable	analysis of next steps for settlement
5/17/2019	Maia Goodell	0:12:00	Billable	review communication from opposing counsel re assessment plan and monitor
5/17/2019	Seth Packrone	0:30:00	Billable	Tc with consulting expert re: update on case
5/17/2019	Seth Packrone	0:18:00	Billable	Check in with A. Pollioni re: update on settlement
5/17/2019	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: next steps for settlement
5/17/2019	Seth Packrone	0:06:00	Billable	Review emails with Ds and expert re: consent order and monitoring tool
5/20/2019	Maia Goodell	0:12:00	Billable	strategy analysis with S.Packrone re response to monitor request and defendant opposition to disclosure of prior monitor report

5/20/2019	Maia Goodell	0:12:00	Billable	strategy analysis with S.Packrone re response to monitor request and defendant opposition to disclosure of prior monitor report
5/20/2019	Seth Packrone	0:12:00	Billable	Check in with M. Goodell re: our position on sharing expert report with external monitor
5/20/2019	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: follow up with external monitor
5/21/2019	Seth Packrone	0:18:00	Billable	Tc with T. Borden re: responding to Ds' request for expert's report and follow up items for settlement and outstanding policies
5/21/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden and team re: team meetings
5/23/2019	Andrea KO	0:24:00	Billable	Team call re: settlement negotiations.
5/23/2019	Andrea KO	0:06:00	Billable	Follow-up discussion with S. Packrone and M. Goodell re: status of settlement.
5/23/2019	Maia Goodell	0:18:00	Billable	call with co-counsel re settlement, defendant position re monitoring
5/23/2019	Maia Goodell	0:18:00	Billable	call with co-counsel re settlement, defendant position re monitoring
5/23/2019	Seth Packrone	0:06:00	Billable	Draft/circulate agenda for today's team call
5/23/2019	Seth Packrone	0:24:00	Billable	Tc with litigation team re: next steps for case
5/23/2019	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: plan for case next week
5/23/2019	Seth Packrone	0:06:00	Billable	Tc with T. Borden re: expert's report and follow up with opposing counsel re: same
6/4/2019	Seth Packrone	0:06:00	Billable	Review emails with Defendants and expert re: expert's report
6/5/2019	Seth Packrone	0:06:00	Billable	Tc with L. Welch re: research on org plaintiffs as class reps
6/7/2019	Andrea KO	0:48:00	Billable	Review edits and comments to external monitor's monitoring tool.
6/7/2019	Andrea KO	0:24:00	Billable	Review DOE proposal re: external monitor
6/7/2019	Maia Goodell	0:24:00	Billable	review defendants' position re external monitor; strategy session with S.Packrone re response to same
6/7/2019	Seth Packrone	0:06:00	Billable	Correspond with team re: correspondence with external monitor moving forward
6/7/2019	Seth Packrone	0:12:00	Billable	Review external monitor's edits/comments to monitoring tool and student interviews
6/7/2019	Seth Packrone	0:06:00	Billable	Correspond with team re: external monitor's edits/comments to DOE monitoring tool
6/7/2019	Seth Packrone	0:06:00	Billable	Review DOE proposal re: external monitor's role
6/7/2019	Seth Packrone	0:18:00	Billable	Check in with M. Goodell re: plan for Monday's meet and confer
6/7/2019	Seth Packrone	0:12:00	Billable	Send proposal for meet and confer to team with thoughts for Monday's call
6/7/2019	Seth Packrone	0:06:00	Billable	Check in with AKO re: plan for Monday's meet and confer
6/10/2019	Andrea KO	0:18:00	Billable	Team call to prepare for meet and confer re: external monitor's role.
6/10/2019	Andrea KO	0:30:00	Billable	Telephonic meet and confer with DOE and DOC re: external monitor's role.
6/10/2019	Andrea KO	0:06:00	Billable	Follow-up conversation with S. Packrone re: external monitor's role.
6/10/2019	Andrea KO	0:12:00	Billable	Follow-up conversation with S. Packrone and M. Goodell re: external monitor's role.
6/10/2019	Andrea KO	0:12:00	Billable	Confer with S. Packrone re: Adam X joint letter draft.
6/10/2019	Andrea KO	0:54:00	Billable	Draft joint letter re: external monitor's role.
6/10/2019	Maia Goodell	0:12:00	Billable	strategy session with S.Packrone re settlement - monitor and fees
6/10/2019	Seth Packrone	0:12:00	Billable	Prep for call with Defendants re: role of external monitor
6/10/2019	Seth Packrone	0:12:00	Billable	Tc with team re: role of external monitor
6/10/2019	Seth Packrone	0:30:00	Billable	Meet and confer with Defendants re: role of external monitor
6/10/2019	Seth Packrone	0:12:00	Billable	Check in with M. Goodell and AKO re: plan for joint letter draft
6/10/2019	Seth Packrone	0:12:00	Billable	Check in with AKO re: plan for drafting joint letter
6/10/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden and AKO re: plan for drafting joint letter
6/10/2019	Seth Packrone	0:36:00	Billable	Revise/edit joint letter re: role for external monitor

6/10/2019	Seth Packrone	0:06:00	Billable	Correspond with team re: edits to joint letter and plan for submitting
6/11/2019	Andrea KO	0:06:00	Billable	Review finalized joint letter re: external monitor's role.
6/11/2019	Maia Goodell	0:12:00	Billable	review and supplement letter to court re settlement - monitor positions
6/11/2019	Michelle Caiola	0:12:00	Billable	Discuss research issues and settlement class stip requirements with S Packrone
6/11/2019	Seth Packrone	0:06:00	Billable	Review DOE responses to external monitor's comments on monitoring tool
6/11/2019	Seth Packrone	0:06:00	Billable	Tc with A. Pollioni re: edits to joint letter
6/11/2019	Seth Packrone	0:12:00	Billable	Edit/finalize joint letter to send to Defendants
6/11/2019	Seth Packrone	0:06:00	Billable	Correspond with Defendants re: joint letter
6/11/2019	Seth Packrone	0:06:00	Billable	Create attachment about external monitor to send with joint letter
6/11/2019	Seth Packrone	0:12:00	Billable	Correspond with team re: attachment for joint letter and other edits
6/11/2019	Seth Packrone	0:12:00	Billable	Update letter to include Attachment and correspond with team re: same
6/11/2019	Seth Packrone	0:06:00	Billable	Correspond with Defendants re: updated letter
6/11/2019	Seth Packrone	0:06:00	Billable	Tc with M. Caiola re: requirements for class cert
6/11/2019	Seth Packrone	0:12:00	Billable	Follow up with Defendants re: status of Ds' joint letter portion
6/11/2019	Seth Packrone	0:06:00	Billable	Review DOE section of letter and follow up with T. Borden
6/11/2019	Seth Packrone	0:12:00	Billable	Review final joint letter and follow up with team re: same
6/12/2019	Andrea KO	0:12:00	Billable	Receive instructions from S. Packrone re: class certification research.
6/13/2019	Andrea KO	0:30:00	Billable	TC with co-counsel re: next steps in settlement negotiations.
6/13/2019	Andrea KO	0:18:00	Billable	Follow-up with S. Packrone re: next steps in settlement negotiations.
6/13/2019	Andrea KO	0:06:00	Billable	Discuss client outreach with S. Packrone.
6/13/2019	Maia Goodell	0:18:00	Billable	follow up to co-counsel strategy session with S.Packrone to plan next steps for upcoming settlement court conference
6/13/2019	Seth Packrone	0:42:00	Billable	Prep for settlement conference by reviewing and taking notes on all documents exchanged since last conference
6/13/2019	Seth Packrone	0:30:00	Billable	Team call re: prep for tomorrow's settlement conference (M. Goodell, AKO, E. Kelley, ACLU and Proskauer)
6/13/2019	Seth Packrone	0:18:00	Billable	Strategy session with team re: next steps for class cert
6/14/2019	Maia Goodell	1:00:00	Billable	review fee cases for potential response to defendants at settlement conference
6/14/2019	Maia Goodell	0:30:00	Billable	strategy session with S.Packrone re settlement conference
6/14/2019	Maia Goodell	1:00:00	Billable	travel to Trenton for in-court settlement conference (2.0 total; bill half)
6/14/2019	Maia Goodell	1:00:00	Billable	travel from Trenton for in-court settlement conference (2.0 total; bill half)
6/14/2019	Maia Goodell	6:00:00	Billable	in-court settlement conference re monitor role (reduced for work on other cases)
6/14/2019	Michelle Caiola	0:12:00	Billable	update from MG re conference and timeline
6/14/2019	Seth Packrone	0:54:00	Billable	Travel to and from Adam X. court conference (total was 1.8, bill half)
6/14/2019	Seth Packrone	6:54:00	Billable	Settlement conference with M. Goodell and E. Kelley in Trenton, NJ
6/14/2019	Seth Packrone	0:30:00	Billable	Strategy session with M. Goodell re: plan for settlement conference
6/17/2019	Andrea KO	0:06:00	Billable	Discuss settlement next steps with S. Packrone.
6/17/2019	Andrea KO	0:24:00	Billable	Analyze case law re: class certification standing.
6/17/2019	Seth Packrone	0:06:00	Billable	Follow up with team re: next steps for expert process
6/17/2019	Seth Packrone	0:06:00	Billable	Update AKO re: status of settlement and follow up on agreement about phase 1 verification
6/18/2019	Andrea KO	1:12:00	Billable	Further analyze case law re: class certification standing.
6/18/2019	Seth Packrone	0:06:00	Billable	Follow up on emails with external monitor

6/18/2019	Seth Packrone	0:06:00	Billable	Check in with AKO re: update on class cert research
6/19/2019	Andrea KO	1:00:00	Billable	Draft memorandum re: class certification standing.
6/19/2019	Seth Packrone	0:06:00	Billable	Check in with L. Welch re: research on plaintiffs serving as class reps
6/20/2019	Seth Packrone	0:12:00	Billable	Review notes/send to team
6/20/2019	Seth Packrone	0:06:00	Billable	Correspond with external monitor re: plan for call
6/24/2019	Andrea KO	2:30:00	Billable	Analyze case law and draft memorandum re: class certification standing.
6/24/2019	Seth Packrone	0:12:00	Billable	Follow up with team, expert, and defendants re: call with external monitor
6/25/2019	Andrea KO	0:24:00	Billable	Team TC re: external monitor's role.
6/25/2019	Seth Packrone	0:06:00	Billable	Correspond with team re: plan for follow up about settlement response from Defendants
6/25/2019	Seth Packrone	0:06:00	Billable	Review memo re: potential plaintiffs for class cert
6/25/2019	Seth Packrone	0:06:00	Billable	Correspond with M. Goodell re: class cert memo and next steps
6/25/2019	Seth Packrone	0:12:00	Billable	Review external monitor's further edits/comments and follow up with Defendants re: same
6/25/2019	Seth Packrone	0:30:00	Billable	Review Defendants' edits to settlement agreement
6/25/2019	Seth Packrone	0:24:00	Billable	Tc with T. Borden, AKO, and A. Pollioni re: next steps for settlement
6/26/2019	Seth Packrone	0:18:00	Billable	Update client re: status of case
6/27/2019	Seth Packrone	0:06:00	Billable	Follow up with client re: settlement draft
6/28/2019	Andrea KO	1:30:00	Billable	Work session with S. Packrone, T. Borden, and A. Pollini re: responding to settlement agreement revisions from DOE and DOC.
6/28/2019	Andrea KO	0:48:00	Billable	Work session with S. Packrone, T. Borden, and A. Pollini re: responding to settlement agreement revisions from DOE and DOC.
6/28/2019	Michelle Caiola	0:06:00	Billable	update from MG re Defendants' push back on draft and timeline
6/28/2019	Seth Packrone	1:24:00	Billable	Work session with AKO, T. Borden, and A. Pollioni re: responding to Defendants' settlement redline
6/28/2019	Seth Packrone	0:54:00	Billable	Additional work session with T. Borden and A. Pollioni re: continue to respond to Defendants' redline of Settlement Agreement and plan for call with external monitor
6/28/2019	Seth Packrone	0:30:00	Billable	Tc with T. Borden, A. Pollioni, Defendants and external monitor re: scope of external monitor's role
6/28/2019	Seth Packrone	0:42:00	Billable	Follow up work session with T. Borden and A. Pollioni re: finish response to Ds' redline and draft agenda and issue list for next settlement conference
6/30/2019	Maia Goodell	1:06:00	Billable	review settlement redline and analyze major outstanding issues
7/1/2019	Maia Goodell	0:42:00	Billable	draft analysis of major settlement disputes outstanding and potential positions
7/1/2019	Seth Packrone	0:12:00	Billable	Review MG's list of issues from DOC's response and follow up with MG re: same
7/1/2019	Seth Packrone	0:06:00	Billable	Plan for next steps in settlement negotiations
7/1/2019	Seth Packrone	0:06:00	Billable	Correspond with team re: MG's list of issues for settlement
7/1/2019	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: class cert research
7/2/2019	Maia Goodell	0:48:00	Billable	analysis of outstanding issues in settlement
7/2/2019	Seth Packrone	0:12:00	Billable	Send settlement update to Defendants
7/2/2019	Seth Packrone	0:12:00	Billable	Review MG's case law research on class cert and follow up re: same
7/3/2019	Maia Goodell	0:48:00	Billable	strategy session with S.Packrone re major outstanding issues in settlement
7/3/2019	Seth Packrone	0:48:00	Billable	Strategy session with M. Goodell re: comp ed/ps' monitoring in settlement
7/3/2019	Seth Packrone	0:12:00	Billable	Review L. Welch memo re: org plaintiffs as class reps
7/8/2019	Maia Goodell	0:42:00	Billable	strategy session with co-counsel re defendants' settlement responses, prep for upcoming in-court settlement meeting
7/8/2019	Maia Goodell	0:12:00	Billable	planning with S. Packrone re upcoming in-court settlement meeting
7/8/2019	Seth Packrone	0:12:00	Billable	Prep for settlement conference by reviewing relevant documents
7/8/2019	Seth Packrone	0:06:00	Billable	Review 003.007 and follow up re: same

7/8/2019	Seth Packrone	0:36:00	Billable	Review settlement draft and our resposnes and prep for settlement conference
7/8/2019	Seth Packrone	0:48:00	Billable	Review/rewrite summary of case law research on class rep standing
7/8/2019	Seth Packrone	0:54:00	Billable	Tc with J. LoCicero, M. Goodell, T. Borden, and A. Pollioni re: plan for next settlement conference
7/8/2019	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: plan for tomorrow's settlement conference
7/9/2019	Maia Goodell	0:24:00	Billable	strategy session with S.Packrone re DOE monitoring regulations to prep for settlement meeting
7/9/2019	Maia Goodell	0:30:00	Billable	meeting with co-counsel re defendant settlement positions and strategy for response during lunch break
7/9/2019	Seth Packrone	1:12:00	Billable	Travel to and from Adam X. settlement conference in Trenton, NJ (2.5 total, bill half)
7/9/2019	Seth Packrone	4:18:00	Billable	Adam X. Settlement conference with all parties
7/9/2019	Seth Packrone	0:12:00	Billable	Follow up with team re: result of settlement conference
7/9/2019	Seth Packrone	0:06:00	Billable	Correspond with A. Pollioni and review absenteeism policy for DOE schools
7/10/2019	Michelle Caiola	0:18:00	Billable	update from SP re settlement meeting and status re terms
7/10/2019	Seth Packrone	0:06:00	Billable	Follow up with T. Borden and team re: next steps for settlement and drafting response to Ds
7/10/2019	Seth Packrone	0:06:00	Billable	Update M. Caiola re: yesterday's settlement conference
7/10/2019	Seth Packrone	0:36:00	Billable	Review/edit ntoes from E. Kelley from settlement conference
7/11/2019	Seth Packrone	0:06:00	Billable	Correspond with team re: next steps for responding to settlement agreemeent
7/12/2019	Seth Packrone	2:00:00	Billable	Work session with T. Borden, A. Pollioni re: revising settlement agreement based on last settlement conference
7/12/2019	Seth Packrone	0:48:00	Billable	Follow up work session with T. Borden and A. Pollioni re: finalizing draft of comments/edits to settlement agreemeent to circulate to team
7/15/2019	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: external monitor's role moving forward
7/16/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: proposal for external monitor and next draft of settlement
7/16/2019	Seth Packrone	0:12:00	Billable	Review case law from L. Welch re: org plaintiffs as class reps
7/16/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: plan for sending settlement proposal
7/17/2019	Andrea KO	0:18:00	Billable	Discuss Adam X. class certification with M. Goodell.
7/17/2019	Maia Goodell	0:30:00	Billable	review A.Kozak-Oxnard memo re class representative standing and provide direction for further research
7/17/2019	Maia Goodell	0:18:00	Billable	Strategize settlement next steps
7/22/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: checking in with client
7/22/2019	Seth Packrone	0:06:00	Billable	Follow up on correspondence with opposing counsel
7/23/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: plan for call and DOC policies
7/23/2019	Seth Packrone	0:06:00	Billable	Tc with T. Borden re: plan for call and review of policies/developing external monitor proposal
7/23/2019	Seth Packrone	0:30:00	Billable	Review policies provided by DOC (transition services, make up classes, referrals and records requests)
7/23/2019	Seth Packrone	0:12:00	Billable	Review/analyze child find draft policy from the DOC
7/23/2019	Seth Packrone	0:42:00	Billable	Tc with T. Borden, A. Pollioni and defendants re: settlement agreement and DOC policies
7/23/2019	Seth Packrone	0:12:00	Billable	Follow up tc with T. Borden re: next steps for external monitor proposal and DOC policies
7/24/2019	Seth Packrone	0:36:00	Billable	Tc with T. Borden and client re: update on case
7/24/2019	Seth Packrone	2:00:00	Billable	Work session with T. Borden and A. Pollioni re: monitoring proposal for Defendants
7/25/2019	Seth Packrone	0:12:00	Billable	Review proposal for external monitor beyond Period 1 verification
7/25/2019	Seth Packrone	0:24:00	Billable	Draft response on policies from DOC
7/26/2019	Seth Packrone	0:12:00	Billable	Finalize resposne to Defendants re: new policies
7/29/2019	Seth Packrone	0:06:00	Billable	Case planning for next steps for settlement negotiations
7/29/2019	Seth Packrone	0:12:00	Billable	Revise org plaintiff memo

7/30/2019	Maia Goodell	0:30:00	Billable	review and analyze defendants' proposal for monitoring and draft response to same
7/30/2019	Maia Goodell	0:12:00	Billable	strategy session with S.Packrone re response to defendants' proposal for monitoring
7/30/2019	Seth Packrone	0:18:00	Billable	Correspond with M. Goodell re: external monitor proposal
7/30/2019	Seth Packrone	0:12:00	Billable	Tc with M. Goodell re: changes to external monitor proposal
7/31/2019	Maia Goodell	0:12:00	Billable	review co-counsel edits to proposal for monitor role; analysis over email with S.Packrone
7/31/2019	Seth Packrone	0:12:00	Billable	Input M. Goodell's edits and correspond with T. Borden re: same
7/31/2019	Seth Packrone	0:18:00	Billable	Review co-counsel's edits to external monitor's proposal and follow up with M. Goodell and T. Borden re: same
7/31/2019	Seth Packrone	0:42:00	Billable	Tc with T. Borden re: edits to defendants' proposal
7/31/2019	Seth Packrone	0:36:00	Billable	Finalize external monitor proposal and send to Ds
8/1/2019	Seth Packrone	0:18:00	Billable	Review/take notes on DOE response to our settlement proposal
8/1/2019	Seth Packrone	0:12:00	Billable	Compile summary of DOE positions/comments and send to M. Goodell and T. Borden
8/2/2019	Maia Goodell	0:30:00	Billable	review summary of DOE and DOC settlement redline responses from S.Packrone and plan response
8/2/2019	Seth Packrone	0:06:00	Billable	Prep for next settlement conference
8/2/2019	Seth Packrone	0:18:00	Billable	Review DOC response to settlement
8/2/2019	Seth Packrone	0:24:00	Billable	Strategy session with M. Goodell re: plan for Tuesday's settlement conference
8/5/2019	Andrea KO	0:06:00	Billable	Instructions from S. Packrone re: researching monitoring role & class counsel obligations.
8/5/2019	Andrea KO	1:54:00	Billable	Analyze case law re: monitoring role & class counsel obligations.
8/5/2019	Maia Goodell	0:30:00	Billable	review of legal research and strategy analysis with S.Packrone re monitoring
8/5/2019	Seth Packrone	0:06:00	Billable	Case planning for next steps in case
8/5/2019	Seth Packrone	0:12:00	Billable	Tc with client re: update on his situation
8/5/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re; plan for settlement conference
8/5/2019	Seth Packrone	0:06:00	Billable	Check in with AKO re: plan for tomorrow's settlement conference
8/5/2019	Seth Packrone	0:12:00	Billable	Correspond with T. Borden re: plan for tomorrow
8/5/2019	Seth Packrone	0:06:00	Billable	Review LR case decision
8/5/2019	Seth Packrone	0:06:00	Billable	Prep for tomorrow's settlement conference
8/5/2019	Seth Packrone	0:06:00	Billable	Check in with AKO re: status of negotiations
8/5/2019	Seth Packrone	0:06:00	Billable	Check in with AKO re: plan for negotiations moving forward
8/6/2019	Andrea KO	1:00:00	Billable	Travel from NYC to Trenton for settlement conference (2 hours total, bill half)
8/6/2019	Andrea KO	4:18:00	Billable	Attend settlement conference
8/6/2019	Andrea KO	1:00:00	Billable	Travel from Trenton to NYC for settlement conference (2 hours total, bill half)
8/6/2019	Michelle Caiola	0:12:00	Billable	update from conference by S Packrone
8/6/2019	Seth Packrone	0:18:00	Billable	Prep for settlement conference by reviewing most recent settlement proposals
8/6/2019	Seth Packrone	1:12:00	Billable	Travel to and from Trenton, NJ for settlement conference (total was 2.5, bill half)
8/6/2019	Seth Packrone	0:30:00	Billable	Prep session with AKO and T. Borden re: plan for settlement conference
8/6/2019	Seth Packrone	4:18:00	Billable	Settlement conference with Defendants with T. Borden and AKO
8/6/2019	Seth Packrone	0:06:00	Billable	Review case law on Pls. monitoring obligations and follow up with AKO
8/7/2019	Andrea KO	0:42:00	Billable	Type up and edit notes from settlement conference.
8/7/2019	Andrea KO	0:24:00	Billable	Analyze Third Circuit organizational standing case law.
8/7/2019	Maia Goodell	0:42:00	Billable	strategy session with S.Packrone re settlement - cage, fees, compensatory education

8/7/2019	Seth Packrone	0:42:00	Billable	Strategy session with M. Goodell re: next steps for case
8/7/2019	Seth Packrone	0:12:00	Billable	Get feedback from M. Caiola re: status of settlement
8/9/2019	Seth Packrone	1:54:00	Billable	Work session with T. Borden and A. Pollioni
8/12/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden, A. Pollioni, and M. Goodell re: settlement draft
8/12/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: client visits
8/13/2019	Maia Goodell	1:36:00	Billable	review revised settlement agreement, responses to defendant position; draft analysis of potential compromise positions on three outstanding issues
8/13/2019	Seth Packrone	0:06:00	Billable	Correspond with M. Goodell and team re: MG's edits to settlement
8/13/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: follow up about client and plan for other client visits
8/13/2019	Seth Packrone	0:12:00	Billable	Review MG's edits to settlement and correspond with AP and TB re: same
8/14/2019	Michelle Caiola	0:06:00	Billable	update on monitoring issue
8/15/2019	Seth Packrone	0:06:00	Billable	Correspond with team re: finalizing settlement agreement
8/15/2019	Seth Packrone	0:24:00	Billable	Review settlement agreement/edit put in comments
8/15/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden and A. Pollioni re: edits to settlement agreement and plan for sending to Ds
8/15/2019	Seth Packrone	0:36:00	Billable	Tc with client and T. Borden re: update on case
8/15/2019	Seth Packrone	0:06:00	Billable	Follow up with T. Borden re: next steps for client meetings
8/15/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: status of settlement agreement
8/19/2019	Andrea KO	0:12:00	Billable	Instructions from S. Packrone re: researching organizational plaintiff standing.
8/19/2019	Seth Packrone	0:12:00	Billable	Check in with AKO re: research for class cert
8/19/2019	Seth Packrone	0:06:00	Billable	Correspond with AKO org plaintiff and class cert research
8/20/2019	Andrea KO	1:18:00	Billable	Review and revise organizational plaintiff standing memorandum; analyze further case law re: same.
8/20/2019	Andrea KO	1:42:00	Billable	Compile and analyze Third Circuit case law re: organizational standing.
8/20/2019	Seth Packrone	0:18:00	Billable	Draft rough draft of comp ed proposal
8/20/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden and A. Pollioni re: draft of comp ed proposal
8/21/2019	Maia Goodell	0:24:00	Billable	strategy session with S.Packrone re settlement - compensatory education structure
8/21/2019	Seth Packrone	0:30:00	Billable	Strategy session with M. Goodell re: comp ed proposals for Defendants
8/21/2019	Seth Packrone	0:12:00	Billable	Correspond with A. Pollioni and T. Borden re: comp ed proposals
8/22/2019	Andrea KO	1:24:00	Billable	Research and analyze case law re: class representative payments in prison cases.
8/22/2019	Andrea KO	1:30:00	Billable	Draft memorandum re: organizational plaintiff standing.
8/22/2019	Maia Goodell	0:30:00	Billable	call with co-counsel re DOC and DOE settlement response, compensatory education, class rep payments
8/22/2019	Maia Goodell	0:30:00	Billable	strategy session with S.Packrone and A.Kozak-Oxnard re class certification issues and class rep payments
8/22/2019	Seth Packrone	0:06:00	Billable	Correspond with AKO re: case law on class rep awards
8/22/2019	Seth Packrone	0:06:00	Billable	Correspond with A. Pollioni re: comp ed proposals
8/22/2019	Seth Packrone	0:06:00	Billable	Draft agenda for team meeting
8/22/2019	Seth Packrone	0:18:00	Billable	Review/take notes on Ds' redline of monitoring proposal
8/22/2019	Seth Packrone	0:06:00	Billable	Draft notes on Ds' monitoring proposal
8/22/2019	Seth Packrone	0:30:00	Billable	Tc with T. Borden, A. Pollioni, B. Silverman, M. Goodell, and AKO re: status of case and next steps
8/22/2019	Seth Packrone	0:30:00	Billable	Strategy session with AKO and M. Goodell re: next steps for case
8/23/2019	Andrea KO	2:36:00	Billable	Revise memo re: organizational plaintiff standing.
8/23/2019	Seth Packrone	0:18:00	Billable	Draft comp ed proposal/agenda/draft email to Defendants

8/23/2019	Seth Packrone	0:12:00	Billable	Give S. Feldman instructions re: comp ed research, review same, and follow up
8/23/2019	Seth Packrone	0:06:00	Billable	Send draft comp ed proposal and draft agenda to team for consideration
8/23/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden and A. Pollioni re: next steps for case
8/23/2019	Seth Packrone	0:06:00	Billable	Review potential comp ed awards
8/23/2019	Seth Packrone	0:06:00	Billable	Check in with AKO re: status of class rep research
8/26/2019	Andrea KO	0:30:00	Billable	Review S. Packrone's comments and edits to organizational plaintiff standing memo and revise accordingly.
8/26/2019	Andrea KO	0:12:00	Billable	Discuss organizational standing memo and next steps for settlement negotiations with S. Packrone.
8/26/2019	Andrea KO	2:30:00	Billable	Analyze case law and draft memo re: incentive payments to class representatives.
8/26/2019	Andrea KO	0:42:00	Billable	Team call w/co-counsel re: next steps in negotiations and substantive positions.
8/26/2019	Seth Packrone	0:18:00	Billable	Review memo re: org plaintiffs as class reps/edit and send back to AKO
8/26/2019	Seth Packrone	0:12:00	Billable	Check in with AKO re: class rep memo and plan for next settlement conference
8/26/2019	Seth Packrone	0:06:00	Billable	Prep for call with team re: monitoring/comp ed
8/26/2019	Seth Packrone	0:42:00	Billable	Tc with AKO, T. Borden, and A. Pollioni re: plan for next week's settlement conference
8/26/2019	Seth Packrone	0:06:00	Billable	Review case law/memo re: org plaintiffs as class reps
8/26/2019	Seth Packrone	0:06:00	Billable	Correspond team re: comp ed proposal
8/26/2019	Seth Packrone	0:12:00	Billable	Finalize/circulate positions on external monitor counterproposal to Defendants
8/27/2019	Andrea KO	0:06:00	Billable	Email to M. Goodell re: incentive payment memo.
8/27/2019	Andrea KO	0:12:00	Billable	Emails with co-counsel re: compensatory education.
8/27/2019	Maia Goodell	0:18:00	Billable	review legal research and analysis re organizational class rep/comp ed
8/27/2019	Michelle Caiola	0:06:00	Billable	check in with SP re compensatory relief term
8/27/2019	Seth Packrone	0:06:00	Billable	Review incentive award case chart and correspond with AKO re: same
8/27/2019	Seth Packrone	0:06:00	Billable	Reivew A. Pollioni's edits to comp ed proposal
8/27/2019	Seth Packrone	0:12:00	Billable	Correspond with A. Pollioni's edits to comp ed re: thoughts about designing process
8/27/2019	Seth Packrone	0:06:00	Billable	Correspond with M. Goodell re: class reps memo
8/27/2019	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: plan for class cert and follow up with team about the settlement draft
8/28/2019	Michelle Caiola	0:12:00	Billable	follow up with SP re compensatory education
8/28/2019	Seth Packrone	0:06:00	Billable	Review DOC's comments/edits
8/29/2019	Andrea KO	1:24:00	Billable	Review DOC's edits to settlement agreement.
8/29/2019	Andrea KO	0:06:00	Billable	Discuss monitoring with M. Goodell.
8/29/2019	Maia Goodell	0:12:00	Billable	strategy session with S.Packrone re compensatory education
8/29/2019	Seth Packrone	0:12:00	Billable	Edit comp ed proposal
8/29/2019	Seth Packrone	0:42:00	Billable	Review Ds' settlement proposal/pull out issues for agenda
8/29/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: comp ed proposal
8/29/2019	Seth Packrone	0:12:00	Billable	Tc with M. Goodell re: comp ed proposal
8/29/2019	Seth Packrone	0:18:00	Billable	Tc with T. Borden re: comp ed proopsal
8/29/2019	Seth Packrone	0:24:00	Billable	Tc with T. Borden and J. LoCicero re: comp ed proposal
8/29/2019	Seth Packrone	0:06:00	Billable	Tc with M. Caiola re: status of comp ed proposal
8/30/2019	Andrea KO	0:06:00	Billable	Review agenda for upcoming settlement conference.
8/30/2019	Andrea KO	0:18:00	Billable	Discuss compensatory education proposal with S. Packrone.

8/30/2019	Andrea KO	0:12:00	Billable	TC with external consulting expert and S. Packrone re: compensatory education proposal.
8/30/2019	Maia Goodell	0:12:00	Billable	report on co-counsel analysis of potential compensatory education proposals and plan next steps for settlement in light of same
8/30/2019	Seth Packrone	0:06:00	Billable	Follow up with external consulting expert re: comp ed
8/30/2019	Seth Packrone	0:30:00	Billable	Prep for settlement conference by reviewing most recent settlement drafts/monitoring proposal
8/30/2019	Seth Packrone	0:30:00	Billable	Draft talking points for settlement conference
8/30/2019	Seth Packrone	0:18:00	Billable	Strategy session with M. Goodell re: comp ed proposal
8/30/2019	Seth Packrone	0:18:00	Billable	strategy session with AKO re: comp ed proposal
8/30/2019	Seth Packrone	0:12:00	Billable	Tc with external consulting expert and AKO re: comp ed proposal
9/3/2019	Andrea KO	2:00:00	Billable	Travel from New York City to Trenton for settlement meeting (total 4.0, bill half)
9/3/2019	Andrea KO	4:00:00	Billable	Attend settlement conference with NJDOE and NJDOC.
9/3/2019	Seth Packrone	0:12:00	Billable	Prep for settlement conference by reviewing talking points
9/3/2019	Seth Packrone	1:36:00	Billable	Travel to and from home to settlement conference in Trenton, NJ (total was 3.2, bill half)
9/3/2019	Seth Packrone	4:00:00	Billable	Settlement conference with Defendants, T. Borden, A. Pollioni, and AKO
9/3/2019	Seth Packrone	0:06:00	Billable	Correspond with team re: email from Defendants
9/3/2019	Seth Packrone	0:06:00	Billable	Case planning for next steps in litigation
9/4/2019	Michelle Caiola	0:06:00	Billable	update from SP re prior day negotiation progress
9/4/2019	Michelle Caiola	0:06:00	Billable	check in with AKO, confer re DRA role vis a vis monitor
9/5/2019	Andrea KO	0:24:00	Billable	Discuss next steps with S. Packrone.
9/5/2019	Andrea KO	1:30:00	Billable	Review settlement conference notes and draft summary and analysis.
9/5/2019	Maia Goodell	0:18:00	Billable	strategy session with S. Packrone re settlement
9/5/2019	Seth Packrone	0:24:00	Billable	Check in with AKO re: next steps for editing settlement agreement and monitoring proposal
9/5/2019	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: next steps for monitoring proposal
9/5/2019	Seth Packrone	0:12:00	Billable	Correspond with team re: plan for responding to Ds and next meeting with external monitor
9/5/2019	Seth Packrone	0:18:00	Billable	Strategy session with M. Goodell re: comp ed and plaintiffs' monitoring role
9/6/2019	Andrea KO	1:30:00	Billable	Work session with S. Packrone and T. Borden re: revising settlement agreement pursuant to September 3 conference.
9/6/2019	Andrea KO	0:42:00	Billable	Work session with S. Packrone re: revising monitoring role agreement.
9/6/2019	Andrea KO	0:36:00	Billable	Review Defendants' edits to monitoring role agreement.
9/6/2019	Andrea KO	1:24:00	Billable	Work session with S. Packrone re: further revisions to monitoring tool.
9/6/2019	Seth Packrone	1:30:00	Billable	Work session with T. Borden and AKO re: editing settlement agreement
9/6/2019	Seth Packrone	0:42:00	Billable	Work session with AKO re: editing external monitor role document
9/6/2019	Seth Packrone	0:12:00	Billable	Review/revise settlement agreement and class cert definition
9/6/2019	Seth Packrone	0:36:00	Billable	Tc with T. Borden and client re: update on case
9/6/2019	Seth Packrone	0:06:00	Billable	Send settlement draft to team
9/6/2019	Seth Packrone	1:24:00	Billable	Work session with AKO re; editing monitoring proposal
9/8/2019	Seth Packrone	0:30:00	Billable	Review policies to send to Dr. Roberts and correspond with T. Borden re: same
9/8/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: NJDOC policies
9/8/2019	Seth Packrone	0:12:00	Billable	Send Ds NJDOC policies
9/9/2019	Andrea KO	0:06:00	Billable	Emails with T. Borden re: revisions to monitoring role agreement.
9/9/2019	Andrea KO	0:12:00	Billable	Review T. Borden's edits to monitoring role agreement.

9/9/2019	Andrea KO	0:36:00	Billable	TC with T. Borden re: monitoring role agreement.
9/9/2019	Andrea KO	0:06:00	Billable	Emails with T. Borden re: further revisions to monitoring role agreement.
9/9/2019	Andrea KO	0:06:00	Billable	TC with S. packrone re: edits to settlement documents.
9/9/2019	Andrea KO	0:06:00	Billable	Review DOC's email to Dr. Roberts.
9/9/2019	Seth Packrone	0:06:00	Billable	Review TB's edits to monitoring proposal
9/9/2019	Seth Packrone	0:06:00	Billable	Tc with AKO re: monitoring proposal
9/10/2019	Andrea KO	1:00:00	Billable	TC with co-counsel re: edits to settlement agreement and monitoring role agreement.
9/10/2019	Andrea KO	0:06:00	Billable	Follow-up with M. Goodell and S. Packrone re: edits to settlement agreement and monitoring role agreement.
9/10/2019	Andrea KO	0:06:00	Billable	Review T. Borden emails re: Dr. Roberts/DOC policies.
9/10/2019	Seth Packrone	0:06:00	Billable	Review correspondence with external monitor
9/10/2019	Seth Packrone	0:06:00	Billable	Correspond with team re: plan for site visits
9/10/2019	Seth Packrone	0:48:00	Billable	Tc with Adam X. team (AKO, M. Goodell, B. Silverman, T. Borden, and A. Pollioni) re: comp ed and monitoring
9/10/2019	Seth Packrone	0:06:00	Billable	Tc with M. Goodell and AKO re: next steps
9/10/2019	Seth Packrone	0:06:00	Billable	Correspond with AKO re: team call
9/10/2019	Seth Packrone	0:06:00	Billable	Correspond with team re: response about NJSP
9/11/2019	Seth Packrone	0:06:00	Billable	Correspond with Adam X. team re: site visit at EMCF
9/11/2019	Seth Packrone	0:24:00	Billable	Review/edit monitoring proposal and send notes to T. Borden re: same
9/11/2019	Seth Packrone	0:06:00	Billable	Review correspondnce with Defendants and Dr. Roberts and documents sent to her
9/12/2019	Maia Goodell	0:12:00	Billable	discuss monitoring proposal, next steps re compensatory education with S.Packrone
9/12/2019	Seth Packrone	0:12:00	Billable	Check in with M. Goodell re: input on monitoring document
9/12/2019	Seth Packrone	0:12:00	Billable	Draft agenda for Dr. Roberts call and correspond with T. Borden re: same
9/12/2019	Seth Packrone	0:06:00	Billable	Correspond with Defendants re: agenda for call with Dr. Roberts
9/12/2019	Seth Packrone	0:12:00	Billable	Draft response to Defendants and email to T. borden
9/12/2019	Seth Packrone	0:06:00	Billable	Correspond with T. borden re: monitoring agreement and settlement proposal
9/13/2019	Andrea KO	0:18:00	Billable	TC with opposing counsel re: Dr. Roberts.
9/13/2019	Andrea KO	0:54:00	Billable	TC with opposing counsel and Dr. Roberts.
9/13/2019	Andrea KO	0:36:00	Billable	Follow-up TC with co-counsel re: settlement agreement revisions.
9/13/2019	Seth Packrone	0:06:00	Billable	Correspond with Dr. Roberts and Defendants re: plan for call
9/13/2019	Seth Packrone	0:06:00	Billable	Prep for call with Dr. Roberts and Defendants
9/13/2019	Seth Packrone	0:18:00	Billable	Tc with T. Borden, A. Pollioni, and AKO with Defendants re: plan for call with Dr. Roberts
9/13/2019	Seth Packrone	0:54:00	Billable	Tc with T. Borden, AKO, A. Pollioni with Defendants and Dr. Roberts re: outstanding issues and plans for monitoring
9/13/2019	Seth Packrone	0:36:00	Billable	Follow up tc with T. Borden, AKO, and A. Pollioni re: responding to monitoring proposal/settlement agreement
9/13/2019	Seth Packrone	0:12:00	Billable	Finalizing response to settlement agreement and monitoring proposal
9/13/2019	Seth Packrone	0:12:00	Billable	Send monitoring proposal and settlement responses to Defendants with notes for next steps
9/16/2019	Seth Packrone	0:36:00	Billable	Travel to DOC facility for client visit (total was 1.2, bill half)
9/16/2019	Seth Packrone	1:48:00	Billable	Meet with client, at DOC facility and wait to be processed
9/16/2019	Seth Packrone	0:24:00	Billable	Travel from DOC facility to second client visit (total was .9, bill half)
9/16/2019	Seth Packrone	1:18:00	Billable	Meet with client #2 re: update on case
9/16/2019	Seth Packrone	0:24:00	Billable	Travel from second client visit back to home after client meeting (total was .8, bill half)

9/16/2019	Seth Packrone	0:06:00	Billable	Correspond with Ds and T. Borden re: Southwoods Prison
9/17/2019	Andrea KO	1:54:00	Billable	TC with opposing counsel re: settlement negotiations.
9/17/2019	Andrea KO	0:18:00	Billable	Correspond with S. Packrone re: monitoring proposal edits.
9/17/2019	Maia Goodell	0:48:00	Billable	review and analyze comp ed proposal and draft analysis for strategy discussion with co-counsel
9/17/2019	Michelle Caiola	0:06:00	Billable	update re status and fees with MG
9/17/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: SWSP
9/17/2019	Seth Packrone	0:06:00	Billable	Tc with T. Borden and correspond re: prep for settlement conference
9/17/2019	Seth Packrone	1:54:00	Billable	Settlement teleconference with M. Vomacka, J. Hoff, AKO, and T. Borden re: monitoring/settlement agreement drafts
9/17/2019	Seth Packrone	0:06:00	Billable	Review schedule/plan for initial monitoring period
9/17/2019	Seth Packrone	0:12:00	Billable	Review/edit comp ed proposal and send to M. Goodell and AKO
9/17/2019	Seth Packrone	0:06:00	Billable	Correspond with M. Goodell re: comp ed proposal
9/17/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden and Defendants re: emails to Dr. Roberts
9/17/2019	Seth Packrone	0:18:00	Billable	Edit/review comp ed prposal and send to T. Borden
9/18/2019	Andrea KO	0:12:00	Billable	Review revised Adam X. comp ed proposal
9/18/2019	Seth Packrone	0:06:00	Billable	Review Dr. Roberts' edits to I&RS policies
9/18/2019	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: follow up with Dr. Roberts about site visits and comp ed proposal
9/19/2019	Andrea KO	0:12:00	Billable	Discuss settlement next steps with S. Packrone.
9/19/2019	Andrea KO	0:06:00	Billable	Emails with S. Packrone re: upcoming team call.
9/19/2019	Maia Goodell	0:12:00	Billable	update and analysis of comp ed proposal with S.Packrone
9/19/2019	Seth Packrone	0:12:00	Billable	Check in with M. Goodell re: edits to comp ed proposal
9/19/2019	Seth Packrone	0:12:00	Billable	Give AKO instructions re: comp ed proposals for individuals and policies to edit
9/19/2019	Seth Packrone	0:06:00	Billable	Update team re: client visits and settlement discussions this week
9/19/2019	Seth Packrone	0:12:00	Billable	Edit/finalize comp ed proposal
9/19/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden and A. Pollioni re: comp ed proposal
9/19/2019	Seth Packrone	0:18:00	Billable	Tc with education attorney re: structure of systemic comp ed awards
9/19/2019	Seth Packrone	0:06:00	Billable	Update M. Goodell re: structure of classwide comp ed proposal
9/19/2019	Seth Packrone	0:12:00	Billable	Draft email to Defendants and prep comp ed proposal to send
9/19/2019	Seth Packrone	0:06:00	Billable	Follow up on emails with Defendants and Dr. Roberts re: editing policies
9/19/2019	Seth Packrone	0:06:00	Billable	Give AKO instructions re: policies to edit and follow up with T. Borden re; client's diploma status
9/19/2019	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: sending Roberts the draft consent order
9/19/2019	Seth Packrone	0:12:00	Billable	Tc with T. Borden and DOE counsel re: sending consent order to Dr. Roberts
9/19/2019	Seth Packrone	0:12:00	Billable	Send email and consent order to Dr. Roberts
9/19/2019	Seth Packrone	0:06:00	Billable	Follow up with opposing counsel re: email to send with draft monitoring proposal to Dr. Roberts
9/20/2019	Seth Packrone	0:06:00	Billable	Send draft Dr. Roberts' agreement to team and Dr. Roberts
9/23/2019	Seth Packrone	0:06:00	Billable	Correspond with team re: follow up from Dr. Roberts
9/24/2019	Andrea KO	0:36:00	Billable	Review Ohio child find policy.
9/25/2019	Andrea KO	0:42:00	Billable	Review NJDOC child find policy; reformat as Word document:
9/25/2019	Andrea KO	1:48:00	Billable	Revise NJDOC child find policy
9/25/2019	Andrea KO	0:54:00	Billable	Review additional NJDOC policies

9/25/2019	Andrea KO	0:24:00	Billable	Draft NJDOC transition policy
9/25/2019	Andrea KO	0:06:00	Billable	Review & analyze IDEA transition planning guide
9/26/2019	Andrea KO	1:00:00	Billable	Research and analyze local education costs for named plaintiffs.
9/27/2019	Andrea KO	1:06:00	Billable	Further research and calculations re: local education costs and compensatory education for named plaintiffs.
10/1/2019	Andrea KO	0:54:00	Billable	Review other jurisdictions' child find policies.
10/1/2019	Andrea KO	1:18:00	Billable	Revise DOC's child find policy.
10/1/2019	Andrea KO	0:06:00	Billable	Discuss draft policies with S. Packrone.
10/1/2019	Andrea KO	0:06:00	Billable	Strategy session with S. Packrone re: compensatory education proposals.
10/1/2019	Seth Packrone	0:12:00	Billable	Review/edit comp ed proposal from AKO
10/1/2019	Seth Packrone	0:06:00	Billable	Review Dr. Roberts' comments on policies and correspond with team re: same
10/1/2019	Seth Packrone	0:06:00	Billable	Tc with AKO re: comp ed proposal changes
10/1/2019	Seth Packrone	0:06:00	Billable	Tc with AKO re: revising DOC policies
10/2/2019	Andrea KO	1:12:00	Billable	Revise first half of child find policy.
10/2/2019	Andrea KO	1:06:00	Billable	Revise second half of child find policy.
10/2/2019	Andrea KO	1:00:00	Billable	Revise transition services policy.
10/2/2019	Andrea KO	0:06:00	Billable	TC with S. Packrone re: NJDOC transition services policy.
10/2/2019	Andrea KO	0:06:00	Billable	Emails with co-counsel re: next steps.
10/2/2019	Seth Packrone	0:12:00	Billable	Tc with client re: update on case
10/2/2019	Seth Packrone	0:12:00	Billable	Correspond with T. Borden and team re: next steps for case and follow up on plan for settlement conference
10/2/2019	Seth Packrone	0:12:00	Billable	Review/edit child find policy based on AKO's edits and send back to her
10/2/2019	Seth Packrone	0:06:00	Billable	Correspond with AKO re: edit to policy
10/2/2019	Seth Packrone	0:06:00	Billable	Tc with AKO re: edits to transition policy
10/2/2019	Seth Packrone	0:12:00	Billable	Revise comp ed proposal for individuals and correspond with M> Goodell re: same
10/3/2019	Andrea KO	0:24:00	Billable	Strategy session with S. Packrone re: NJDOC policies.
10/3/2019	Andrea KO	0:18:00	Billable	Further revisions to child find policy following discussions with S. Packrone.
10/3/2019	Andrea KO	0:18:00	Billable	Draft email to co-counsel re: child find policy revisions and compensatory education proposals.
10/3/2019	Andrea KO	0:24:00	Billable	Review DOE response to external monitoring role.
10/3/2019	Andrea KO	0:06:00	Billable	Review DOE response to settlement agreement draft.
10/3/2019	Seth Packrone	0:06:00	Billable	Tc with client re: update on case
10/3/2019	Seth Packrone	0:06:00	Billable	Get feedback from M. Goodell re: comp ed proposals and transition and child find policies
10/3/2019	Seth Packrone	0:24:00	Billable	Work session with AKO re: child find and transition policies
10/3/2019	Seth Packrone	0:06:00	Billable	Review short memo to team re: update on child find/transition policies and comp ed
10/3/2019	Seth Packrone	0:06:00	Billable	Case planning for next steps in settlement negotiations
10/4/2019	Andrea KO	0:24:00	Billable	Draft and review emails with co-counsel re: compensatory education and child find.
10/7/2019	Andrea KO	0:06:00	Billable	Coordinate next steps with S. Packrone.
10/7/2019	Andrea KO	0:12:00	Billable	Finish revising transition plan policy.
10/7/2019	Seth Packrone	0:06:00	Billable	Review correspondence with team re: documents from Defendants and next steps for settlement negotiations
10/7/2019	Seth Packrone	0:06:00	Billable	Case planning for next steps and timelines for settlement negotiations
10/7/2019	Seth Packrone	0:18:00	Billable	Review DOC's settlement response from 10.3 and DOE's settlement response

10/7/2019	Seth Packrone	0:06:00	Billable	Strategy session with AKO re: plan for tomorrow's call with expert and Thursday's settlement conference
10/7/2019	Seth Packrone	0:06:00	Billable	revise suggested comments to transition policy
10/8/2019	Andrea KO	0:06:00	Billable	Review agenda in advance of Dr. Roberts call.
10/8/2019	Andrea KO	0:06:00	Billable	Review DOC's edits to settlement agreement.
10/8/2019	Andrea KO	0:24:00	Billable	TC with Dr. Roberts.
10/8/2019	Andrea KO	1:12:00	Billable	Follow-up call with co-counsel.
10/8/2019	Maia Goodell	0:06:00	Billable	planning for call with co-counsel re settlement
10/8/2019	Maia Goodell	1:00:00	Billable	call with co-counsel re settlement, outstanding proposals
10/8/2019	Seth Packrone	0:12:00	Billable	Draft agendas/plans for today's calls with Dr. Roberts and internal team call about settlement conference
10/8/2019	Seth Packrone	0:06:00	Billable	Correspond with M. Goodell and T. Borden re: plan for today's calls
10/8/2019	Seth Packrone	0:24:00	Billable	Tc with AKO, T. Borden, A. Pollioni, and J. LoCicero with External Monitor and Defendants re: follow up after initial site visits
10/8/2019	Seth Packrone	1:12:00	Billable	Tc with M. Goodell, AKO, T. Borden, J. LoCicero, B. Silverman, and A. Pollioni re: plan for Thursday's settlement conference
10/8/2019	Seth Packrone	0:06:00	Billable	Correspond with team re: agenda for Thursday
10/8/2019	Seth Packrone	0:06:00	Billable	Review DOC response and compare to our most recent settlement demand
10/8/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden and draft email to Defendants re: Thursday's settlement conference
10/8/2019	Seth Packrone	0:12:00	Billable	Correspond with AKO and T. Borden re: surrogate parent issue in CF policy
10/9/2019	Andrea KO	1:06:00	Billable	Discuss child find policy revisions with S. Packrone.
10/9/2019	Andrea KO	0:06:00	Billable	Revise child find policy per discussion with S. Packrone.
10/9/2019	Maia Goodell	0:12:00	Billable	strategy session with S.Packrone re upcoming settlement meeting
10/9/2019	Seth Packrone	0:06:00	Billable	Send agenda to Defendants and follow up with co-counsel re: transition and child find policies
10/9/2019	Seth Packrone	0:12:00	Billable	Prep for 10/10 settlement conference with Defendants
10/9/2019	Seth Packrone	0:12:00	Billable	Tc with A. Pollioni re: changes to child find policy
10/9/2019	Seth Packrone	0:06:00	Billable	Edit TS and CF policies and send to AKO to finalize
10/9/2019	Seth Packrone	0:06:00	Billable	Tc with AKO re: finalizing Transition services and CF policies
10/9/2019	Seth Packrone	0:06:00	Billable	Review DOE response to monitoring role proposal
10/9/2019	Seth Packrone	0:12:00	Billable	Strategy session with M. Goodell re: response to latest monitoring proposal from Defendants
10/9/2019	Seth Packrone	0:12:00	Billable	Tc with aKO re: edits to Child Find and Transition policy and finalize and send to Defendants
10/9/2019	Seth Packrone	0:06:00	Billable	Correspond with co-counsel re: positions on monitoring psoposal
10/10/2019	Seth Packrone	1:24:00	Billable	Travel to and from settlement conference at DNJ (total was 2.8, bill half)
10/10/2019	Seth Packrone	0:12:00	Billable	Strategy session with team re; plan for settlement conference
10/10/2019	Seth Packrone	3:42:00	Billable	Settlement conference with J. LoCicero, T. Borden, AKO, and A. Pollioni and Defendants
10/10/2019	Seth Packrone	0:06:00	Billable	Correspond with external monitor
10/11/2019	Seth Packrone	0:06:00	Billable	Check in with T. Atkinson re: child find policy for DOC
10/11/2019	Seth Packrone	0:12:00	Billable	Correspond with T. Borden re: plan for follow up with Defendants about PLRA, comp ed, etc.
10/15/2019	Seth Packrone	0:06:00	Billable	Correspond with A. Pollioni re: comp ed proposal to send to Defendants
10/15/2019	Seth Packrone	0:12:00	Billable	Revise access to information proposal and follow up with AKO re: same
10/15/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden and defense counsel re: high school diploma for client
10/16/2019	Seth Packrone	0:06:00	Billable	Correspond with team re: status of tomorrow's call and next steps for negotiations
10/17/2019	Andrea KO	0:06:00	Billable	TC with S. Packrone re: incentive awards.

10/21/2019	Seth Packrone	0:18:00	Billable	Draft follow up responses for DOC re: access to information and comp ed and send to team
10/21/2019	Seth Packrone	0:12:00	Billable	Strategy session with M. Goodell re: access to information proposal for Defendants
10/21/2019	Seth Packrone	0:06:00	Billable	Correspond with DOC re; agenda for call with Dr. Roberts
10/21/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: access to information proposal
10/22/2019	Andrea KO	0:06:00	Billable	Discuss compensatory education proposal with S. Packrone.
10/22/2019	Andrea KO	0:12:00	Billable	Review emails with co-counsel re: comp. ed. Proposal.
10/22/2019	Seth Packrone	0:06:00	Billable	Strategy session with AKO re: next stepsf or responses to Defendants
10/22/2019	Seth Packrone	0:12:00	Billable	Prep proposals for Defendants and send to team
10/22/2019	Seth Packrone	0:12:00	Billable	Correspond with T. Borden re; draft agenda/email to send to Dr. Roberts
10/22/2019	Seth Packrone	0:06:00	Billable	Correspond with team re: email to Dr. Roberts and follow up with Defendants re: same
10/23/2019	Andrea KO	0:06:00	Billable	Emails with co-counsel re: proposals to send to Defendants.
10/23/2019	Andrea KO	0:36:00	Billable	Conference call with Dr. Roberts.
10/23/2019	Seth Packrone	0:06:00	Billable	Check in with team re: proposals to send Defendants
10/23/2019	Seth Packrone	0:12:00	Billable	Finalize proposals for Defendants re: comp ed, access to information, etc.
10/23/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: finalizing settlement proposals for Defendants
10/23/2019	Seth Packrone	0:24:00	Billable	Tc with external monitor and Defendants and T. Borden, AKO, and A. Pollioni re; substantial compliance for DOC
10/23/2019	Seth Packrone	0:06:00	Billable	Tc with T. Borden re: response to Defendants
10/23/2019	Seth Packrone	0:06:00	Billable	Prep proposals and send to Defendants
10/28/2019	Andrea KO	0:06:00	Billable	Discuss response to letter from DOC with responsive positions with S. Packrone.
10/28/2019	Seth Packrone	0:06:00	Billable	Case planning for next steps in settlement negotiations
10/28/2019	Seth Packrone	0:06:00	Billable	Check in with M. Goodell re: Defendants' latest settlement response
10/28/2019	Seth Packrone	0:18:00	Billable	Review/analyze DOC's latest settlement response
10/28/2019	Seth Packrone	0:06:00	Billable	Give AKO instructions re: fees research
10/28/2019	Seth Packrone	0:12:00	Billable	Draft our positions on Ds' latest settlement proposal
10/29/2019	Seth Packrone	0:06:00	Billable	Review Ds' edits for document to send to Dr. Roberts
10/29/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re; plan for agenda for Thursday's settlement conference
10/29/2019	Seth Packrone	0:24:00	Billable	Review DOC's letter and draft notes for team for settlement conference
10/30/2019	Maia Goodell	0:36:00	Billable	analysis of defendant settlement responses and plan for in-court settlement meeting with S.Packrone
10/30/2019	Seth Packrone	0:36:00	Billable	Get instruction from M. Goodell re: positions for tomorrow's settlement conference
10/30/2019	Seth Packrone	0:06:00	Billable	Prep for tomorrow's settlement conference by reviewing latest proposals from Defendants
10/30/2019	Seth Packrone	0:18:00	Billable	Draft talking points for tomorrow's settlement conference and correspond with T. Broden re: same
10/31/2019	Andrea KO	0:54:00	Billable	Travel from NYC to Trenton for settlement conference (1.8 total, bill half)
10/31/2019	Andrea KO	4:00:00	Billable	Attend settlement conference.
10/31/2019	Andrea KO	1:00:00	Billable	Travel from Trenton to NYC for settlement conference (2.0 total, bill half)
10/31/2019	Seth Packrone	1:30:00	Billable	Travel to and from District Court in Trenton for settlement conference (total was 3 hours)
10/31/2019	Seth Packrone	4:00:00	Billable	Attend settlement conference with Defendants with AKO, A. Pollioni, and T. Borden
10/31/2019	Seth Packrone	0:06:00	Billable	Corresond with T. Borden re: next meeting with joint expert and follow up on conferences
11/1/2019	Andrea KO	1:42:00	Billable	Review detailed notes from last settlement conference and draft email to all parties listing all action items and other next steps.
11/1/2019	Maia Goodell	0:24:00	Billable	update on settlement status following conference with S.Packrone; plan next steps

11/1/2019	Seth Packrone	0:12:00	Billable	Update M. Caiola re: result of settlement conference yesterday
11/1/2019	Seth Packrone	0:24:00	Billable	Update M. Goodell re: result of settlement conference and next steps
11/1/2019	Seth Packrone	0:12:00	Billable	Review update email for DOC and list of outstanding items
11/4/2019	Andrea KO	1:00:00	Billable	Work session with S. Packrone and T. Borden re: work session on settlement agreement.
11/4/2019	Andrea KO	0:48:00	Billable	Work session with S. Packrone and T. Borden re: work session on monitoring proposal.
11/4/2019	Seth Packrone	0:06:00	Billable	Draft next steps for litigation/settlement negotiations
11/4/2019	Seth Packrone	1:00:00	Billable	Work session with AKO and T. Borden re: revising settlement agreement
11/4/2019	Seth Packrone	0:48:00	Billable	Work session with AKO and T. Borden re: revising joint monitoring proposal
11/4/2019	Seth Packrone	0:06:00	Billable	Correspond with co-counsel re: drafting notice for settlement agreement
11/5/2019	Andrea KO	0:18:00	Billable	Discuss next steps with M. Caiola and M. Weaver.
11/5/2019	Seth Packrone	0:12:00	Billable	Review Dr. Roberts' draft rubric and follow up with team re: same
11/5/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: settlement draft sent to Defendants and review same
11/5/2019	Seth Packrone	0:24:00	Billable	Review external monitoring role document, draft notes for call tomorrow, and send to team
11/6/2019	Andrea KO	0:24:00	Billable	TC with T. Borden and S. Packrone re: preparing for settlement negotiations call.
11/6/2019	Andrea KO	0:48:00	Billable	Settlement negotiations call.
11/6/2019	Michelle Caiola	0:06:00	Billable	review update to counsel re staffing
11/6/2019	Michelle Caiola	0:12:00	Billable	fees issue with SP, provide drafts of chart from another case
11/6/2019	Seth Packrone	0:06:00	Billable	Prep for tc with Defense counsel re: external monitoring proposal
11/6/2019	Seth Packrone	0:18:00	Billable	Tc with T. Borden and AKO re: plan for call with Defendants about external monitoring proposal
11/6/2019	Seth Packrone	0:48:00	Billable	Tc with T. Borden, AKO, A. Pollioni, and R. Gorkin with Defense counsel re: next steps for external monitoring proposal
11/6/2019	Seth Packrone	1:00:00	Billable	Work session with T. Borden re: revising external monitoring proposal based on call with Defendants
11/6/2019	Seth Packrone	0:06:00	Billable	Review emails with Defendants re: next steps for working with external monitor
11/6/2019	Seth Packrone	0:36:00	Billable	Revise external monitor proposal based on call with T. Borden
11/6/2019	Seth Packrone	0:06:00	Billable	Send external monitoring proposal to T. Borden with notes for next steps
11/7/2019	Andrea KO	0:06:00	Billable	Check in with S. Packrone re: fee record review.
11/7/2019	Andrea KO	0:30:00	Billable	TC with co-counsel re: onboarding R. Gorckin.
11/7/2019	Seth Packrone	0:30:00	Billable	Tc with team re: next steps for case and AKO
11/7/2019	Seth Packrone	0:06:00	Billable	Correspond with Defendants re: distribution lists
11/8/2019	Michelle Caiola	0:12:00	Billable	run down with SP re fee review, next steps
11/8/2019	Seth Packrone	0:06:00	Billable	Correspond with team re: Dr. Roberts' rubrics for evaluating DOC compliance
11/8/2019	Seth Packrone	1:18:00	Billable	Review next 40 pp of fee records
11/8/2019	Seth Packrone	0:06:00	Billable	Update M. Caiola re: status of settlement negotiations and next steps
11/12/2019	Seth Packrone	0:12:00	Billable	Review T. Borden edits to monitoring proposal and correspond with her re: same
11/12/2019	Seth Packrone	2:00:00	Billable	Work session with T. Borden re: revisions to external monitor proposal
11/12/2019	Seth Packrone	0:12:00	Billable	Review Dr. Roberts' draft rubrics and follow up with T. Borden re: same
11/12/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: rubrics
11/14/2019	Andrea KO	0:06:00	Billable	Discuss BOE next steps with S. Packrone.
11/14/2019	Andrea KO	0:12:00	Billable	Receive update from S. Packrone re: DOE's monitoring tool.
11/14/2019	Andrea KO	0:06:00	Billable	Emails with T. Borden and S. Packrone re: DOE's monitoring tool.

11/14/2019	Andrea KO	0:06:00	Billable	Email to T. Borden re: notes from last settlement conference.
11/14/2019	Andrea KO	0:30:00	Billable	Team call re: DOE's monitoring tool and next steps (S. Packrone, T. Borden, W. Silverman, and R. Gorckin).
11/14/2019	Seth Packrone	0:12:00	Billable	Send proposed substantial compliance language to T. Borden with notes re: same
11/14/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: incorporating substantial compliance language into settlement
11/14/2019	Seth Packrone	0:12:00	Billable	Correspond with T. Borden re: DOE framework
11/14/2019	Seth Packrone	0:30:00	Billable	Tc with T. Borden re: reactions to framework
11/14/2019	Seth Packrone	0:18:00	Billable	Check in with AKO re: scope of framework
11/14/2019	Seth Packrone	0:06:00	Billable	Follow up with team re: DOE's framework
11/14/2019	Seth Packrone	0:30:00	Billable	Tc with AKO and co-counsel re: DOE's framework and plan for next week's settlement conference
11/14/2019	Seth Packrone	0:06:00	Billable	Check in with AKO re: plan for tomorrow's call with co-counsel
11/14/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: follow up with opposing counsel about framework
11/14/2019	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: call with opposing counsel about framework
11/15/2019	Andrea KO	1:06:00	Billable	Review fee records.
11/15/2019	Andrea KO	0:24:00	Billable	Strategy session with S. Packrone re: DOE monitoring framework and topics for next settlement conference.
11/15/2019	Andrea KO	0:54:00	Billable	Compile and review relevant IDEA regulations re: discipline procedures.
11/15/2019	Andrea KO	0:18:00	Billable	Update from S. Packrone re: call with DOE about monitoring framework.
11/15/2019	Andrea KO	0:18:00	Billable	Discuss relevant IDEA regulations and DOE monitoring tool guidelines with S. Packrone.
11/15/2019	Andrea KO	0:12:00	Billable	Review and discuss DOC's revisions to settlement agreement and comp. ed. Proposal with S. Packrone.
11/15/2019	Michelle Caiola	0:12:00	Billable	review of initial monitoring report; follow up with SP re next step
11/15/2019	Seth Packrone	0:06:00	Billable	Correspond with M. Caiola re: next steps for case
11/15/2019	Seth Packrone	0:18:00	Billable	Review DOE submissions and follow up with T. Borden re: same
11/15/2019	Seth Packrone	0:24:00	Billable	Review framework from DOE to prep for call with opposing counsel
11/15/2019	Seth Packrone	0:24:00	Billable	Tc with Defendants and T. Borden re: questions about DOE framework
11/15/2019	Seth Packrone	0:12:00	Billable	Check in with AKO re: next steps for responding to DOE's framework
11/15/2019	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: plan for next week's settlement conference
11/15/2019	Seth Packrone	0:24:00	Billable	Review DOE framework with AKO and compare to monitoring tool
11/15/2019	Seth Packrone	0:06:00	Billable	Check in with T. Borden re: DOE monitoring tool
11/15/2019	Seth Packrone	0:06:00	Billable	Case planning for next steps in settlement negotiations and timing re: same
11/15/2019	Seth Packrone	0:06:00	Billable	Follow up about monitoring tool with T. Borden
11/15/2019	Seth Packrone	0:12:00	Billable	Review comp ed proposal from Defendants
11/15/2019	Seth Packrone	0:06:00	Billable	Update M. Caiola re: status of settlement
11/18/2019	Michelle Caiola	0:06:00	Billable	confer with Sp re next steps
11/18/2019	Seth Packrone	0:12:00	Billable	Correspond with team re: plan for settlement conference on Wednesday
11/18/2019	Seth Packrone	0:12:00	Billable	Prep for settlement conference re: reviewing latest documents from Defendants
11/18/2019	Seth Packrone	0:06:00	Billable	Check in with AKO re: plan for settlement conference on Wednesday
11/18/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: Ds' latest responses
11/19/2019	Andrea KO	0:18:00	Billable	Prepare for tomorrow's settlement conference.
11/19/2019	Seth Packrone	0:24:00	Billable	Review documents and most recent DOE proposals to prep for settlement conference
11/19/2019	Seth Packrone	0:18:00	Billable	Review DOC settlement response and DOE monitoring response

11/19/2019	Seth Packrone	0:48:00	Billable	Review/analyze DOE framework and prep questions for tomorrow's settlement conference
11/19/2019	Seth Packrone	0:12:00	Billable	Review/analyze rubrics to prep for settlement conference
11/20/2019	Andrea KO	1:00:00	Billable	Travel from NYC to Trenton for settlement conference (2.0 total, bill half)
11/20/2019	Andrea KO	4:00:00	Billable	Attend settlement conference with DOE and DOC; take detailed notes.
11/20/2019	Andrea KO	1:00:00	Billable	Travel from Trenton to NYC after settlement conference (2.0 total, bill half).
11/20/2019	Michelle Caiola	0:06:00	Billable	update from negotiations from SP
11/20/2019	Seth Packrone	1:30:00	Billable	Travel to and from settlement conference in Trenton, NJ (total was 3, bill half)
11/20/2019	Seth Packrone	4:42:00	Billable	Settlement conference with Defendants in Trenton, NJ
11/20/2019	Seth Packrone	0:06:00	Billable	Send M. Caiola update re: settlement conference
11/20/2019	Seth Packrone	0:06:00	Billable	Draft email to Dr. Roberts on behalf of all parties re: new framework
11/21/2019	Andrea KO	0:18:00	Billable	Strategy session with S. Packrone re: task list email to Defendants.
11/21/2019	Andrea KO	0:12:00	Billable	Edit notes from yesterday's settlement conference and send to S. Packrone and T. Borden.
11/21/2019	Andrea KO	1:00:00	Billable	Draft follow-up email to Defendants re: next steps and task list.
11/21/2019	Andrea KO	0:06:00	Billable	Consult with S. Packrone re: release.
11/21/2019	Andrea KO	0:06:00	Billable	Discuss email re: action items with S. Packrone.
11/21/2019	Andrea KO	0:12:00	Billable	Finalize and send out email to all parties re: action items.
11/21/2019	Michelle Caiola	0:06:00	Billable	review SP release; provide feedback
11/21/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: update for Dr. Roberts
11/21/2019	Seth Packrone	0:12:00	Billable	Correspond with Defendants re: email update for Dr. Roberts
11/21/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: next steps for settlement revisions
11/21/2019	Seth Packrone	0:18:00	Billable	Strategy session with AKO re: next steps for settlement and goals for items to complete prior to next settlement conference
11/21/2019	Seth Packrone	0:06:00	Billable	Review notes from yesterday's settlement conference to prep for work session with T. Borden
11/21/2019	Seth Packrone	0:42:00	Billable	Work session with T. Borden re: revising settlement agreement and comp ed proposal
11/21/2019	Seth Packrone	0:12:00	Billable	Draft module language for new draft of settlement
11/21/2019	Seth Packrone	1:06:00	Billable	Work session with T. Borden re: revising comp ed proposal and rest of settlement
11/21/2019	Seth Packrone	0:36:00	Billable	Draft release language
11/21/2019	Seth Packrone	0:12:00	Billable	Strategy session with T. Atkisson re: release language
11/21/2019	Seth Packrone	0:12:00	Billable	Revise update email to Defendants and follow up with AKO and T. Borden re; same
11/21/2019	Seth Packrone	0:24:00	Billable	Revise settlement draft with new release language
11/22/2019	Seth Packrone	0:06:00	Billable	Correspond with Dr. Roberts re: update on DOE framework
11/22/2019	Seth Packrone	0:30:00	Billable	Revise/finalize settlement draft
11/25/2019	Michelle Caiola	0:06:00	Billable	updated chart on compliance from SP
11/25/2019	Seth Packrone	0:18:00	Billable	Revise settlement with language re: school year and release
11/25/2019	Seth Packrone	0:18:00	Billable	Review and analyze second version of framework produced by DOE with corrections noted
11/25/2019	Seth Packrone	0:06:00	Billable	Give S. Feldman instructions re: comparing versions of DOE framework
11/26/2019	Seth Packrone	0:42:00	Billable	Revise/edit/comment on DOC monitoring proposal and the rest of T. Borden's comments on settlement
11/26/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: scope of release
11/26/2019	Seth Packrone	0:30:00	Billable	Review/edit draft of settlement agreement to send to Defendants
11/26/2019	Seth Packrone	0:48:00	Billable	Work session with T. Borden re: finalize draft settlement to send to Defendants

11/26/2019	Seth Packrone	0:12:00	Billable	Review settlement agreement to send to Ds and correspond with T. Borden re: reversion language
11/26/2019	Seth Packrone	0:06:00	Billable	Follow up with team re: status of settlement negotiations
11/26/2019	Seth Packrone	0:12:00	Billable	Send CAFA research to T. Borden with notes on strategy moving forward
11/26/2019	Seth Packrone	0:06:00	Billable	Tc with T. Borden re: approach with CAFA moving forward
11/27/2019	Seth Packrone	0:12:00	Billable	Review Dr. Roberts comments on framework and follow up with T. Borden re: same
11/27/2019	Seth Packrone	0:06:00	Billable	Draft next steps for settlement negotiations and timelines
12/2/2019	Andrea KO	0:18:00	Billable	Instructions from S. Packrone re: compensatory education application/worksheet.
12/2/2019	Andrea KO	1:36:00	Billable	Draft compensatory education worksheet.
12/2/2019	Seth Packrone	0:18:00	Billable	Give AKO instruction re: drafting comp ed application
12/3/2019	Andrea KO	0:18:00	Billable	Analyze legislation re: mandatory Loop.
12/3/2019	Andrea KO	0:18:00	Billable	Review Dr. Roberts' response to DOE framework.
12/4/2019	Michelle Caiola	0:06:00	Billable	update from Sp
12/4/2019	Seth Packrone	0:06:00	Billable	Check in with S. Feldman re: review of DOE's framework
12/5/2019	Andrea KO	1:06:00	Billable	Revise compensatory education application.
12/5/2019	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re; plan for call with Dr. Roberts
12/5/2019	Seth Packrone	0:06:00	Billable	Check in with AKO re: comp ed worksheet
12/6/2019	Michelle Caiola	0:06:00	Billable	update from Sp re next conference
12/9/2019	Andrea KO	0:12:00	Billable	Strategize re: tomorrow's Dr. Roberts call with S. Packrone.
12/9/2019	Seth Packrone	0:06:00	Billable	Check in with AKO re: plan for call with external monitor
12/10/2019	Andrea KO	0:24:00	Billable	TC with S. Packrone and T. Borden re: prepping for call with Defendants and external monitor.
12/10/2019	Andrea KO	1:24:00	Billable	TC with Defendants and external monitor re: DOE framework.
12/10/2019	Andrea KO	0:12:00	Billable	Follow-up TC with all counsel re: outstanding action items.
12/10/2019	Andrea KO	0:18:00	Billable	Debrief with S. Packrone and T. Borden and discuss next steps.
12/10/2019	Seth Packrone	0:06:00	Billable	Prep for tc with Dr. Roberts and defense counsel
12/10/2019	Seth Packrone	0:24:00	Billable	Tc with with team re: plan for call with Dr. Roberts
12/10/2019	Seth Packrone	1:24:00	Billable	Tc with defense counsel and Dr. Roberts re: next steps for framework and CAP
12/10/2019	Seth Packrone	0:12:00	Billable	Tc with opposing counsel re: status of outstanding items with AKO and T. Borden
12/10/2019	Seth Packrone	0:12:00	Billable	Tc with AKO and T. borden re: plan for weekly call and next week's settlement conference
12/10/2019	Seth Packrone	0:06:00	Billable	Correspond with client re: update
12/10/2019	Seth Packrone	0:06:00	Billable	Correspond with team re: today's conference
12/11/2019	Seth Packrone	0:06:00	Billable	Correspond with client and co-counsel re: upcoming call
12/12/2019	Andrea KO	0:06:00	Billable	Review DOE's comments on external monitoring document.
12/12/2019	Andrea KO	0:18:00	Billable	Team call with T. Borden, S. Packrone, R. Gorkin, and B. Silverman.
12/12/2019	Andrea KO	0:12:00	Billable	Follow-up re: monitoring role with T. Borden and S. Packrone.
12/12/2019	Seth Packrone	0:30:00	Billable	Prep for upcoming settlement conference by reviewing DOE response and other most recent settlement documents
12/12/2019	Seth Packrone	0:18:00	Billable	Edit comp ed app sheet from AKO
12/12/2019	Seth Packrone	0:18:00	Billable	Tc with T. Borden, AKO, R. Gorkin, and B. Silverman re: status of settlement and next steps for case
12/12/2019	Seth Packrone	0:12:00	Billable	Tc with T. Borden and AKO re: monitor's assessment of DOE vs. DOC and recommendations for corrective action
12/16/2019	Michelle Caiola	0:06:00	Billable	update as to status and next steps

12/16/2019	Seth Packrone	0:06:00	Billable	Case planning for next steps for settlement draft
12/16/2019	Seth Packrone	0:48:00	Billable	Tc with client, Arc of NJ with T. Borden re: update on settlement progress and comp ed lists
12/17/2019	Andrea KO	0:48:00	Billable	Strategy session with S. Packrone and T. Borden re: upcoming settlement conference.
12/17/2019	Andrea KO	0:36:00	Billable	Travel from NYC to Trenton for settlement conference (minus time worked; 1.2 total, bill half)
12/17/2019	Andrea KO	3:48:00	Billable	Attend settlement conference with DOE and DOC.
12/17/2019	Andrea KO	0:24:00	Billable	Follow-up with S. Packrone re: settlement conference.
12/17/2019	Andrea KO	0:48:00	Billable	Travel from Trenton to NYC after settlement conference (minus time worked; 1.6 total, bill half)
12/17/2019	Seth Packrone	1:30:00	Billable	Travel to and from DNJ in Trenton for settlement conference (total was 3 hours, bill half)
12/17/2019	Seth Packrone	3:48:00	Billable	Settlement conference at DNJ
12/18/2019	Andrea KO	0:36:00	Billable	Review notes from settlement conference and draft follow-up email to all parties re: post-settlement conference action items.
12/18/2019	Andrea KO	0:18:00	Billable	Review S. Packrone's edits to compensatory education worksheet and make further revisions to same.
12/18/2019	Seth Packrone	0:06:00	Billable	Follow up with Ds and monitoring re: January 15 call
12/18/2019	Seth Packrone	0:06:00	Billable	Review/edit follow up email to Ds re: deadlines and next steps
12/19/2019	Andrea KO	0:48:00	Billable	Strategy session with S. Packrone re: action items and compensatory education position/calculations.
12/19/2019	Andrea KO	0:18:00	Billable	Email to all parties re: next steps.
12/19/2019	Andrea KO	0:06:00	Billable	Follow-up with S. Packrone re: comp ed proposal.
12/19/2019	Seth Packrone	0:06:00	Billable	Check in with T. Borden re: edits to follow up list for Ds
12/19/2019	Seth Packrone	0:48:00	Billable	Strategy session with AKO re: next steps for settlement negotiations and scope of comp ed
12/19/2019	Seth Packrone	0:12:00	Billable	Check in with AKO re: researching comp ed awards
12/19/2019	Seth Packrone	0:30:00	Billable	Tc with T. Borden re: follow up with DOE and scope of comp ed award
12/19/2019	Seth Packrone	0:06:00	Billable	Revise/edit comp ed worksheet
12/19/2019	Seth Packrone	0:12:00	Billable	Send comp ed worksheet to T. Borden with notes for next steps and list of outstanding issues
12/20/2019	Seth Packrone	0:06:00	Billable	Follow up with T. Borden and AKO re: comp ed structure
12/20/2019	Seth Packrone	0:48:00	Billable	Check in with R. Serbin re: comp. ed structure
12/20/2019	Seth Packrone	0:24:00	Billable	Review blackmon jones comp ed provisions
12/20/2019	Seth Packrone	0:06:00	Billable	Case planning for next steps in settlement negotiations
12/20/2019	Seth Packrone	0:12:00	Billable	Review latest policy drafts from Ds
1/7/2020	Andrea KO	0:12:00	Billable	Review email from S. Packrone re: revisions to DOE monitoring proposal and emails to T. Borden re: same.
1/8/2020	Andrea KO	0:12:00	Billable	Review case materials from D.C. case re: comp ed relief.
1/8/2020	Andrea KO	0:30:00	Billable	Research other cases with class-wide comp ed relief.
1/8/2020	Andrea KO	0:18:00	Billable	TC with T. Borden re: revisions to DOE monitoring proposal and allocation of next steps.
1/8/2020	Andrea KO	0:18:00	Billable	Review DOC's revisions to policies sent 12/20.
1/9/2020	Andrea KO	1:36:00	Billable	Revise DOE monitoring document.
1/10/2020	Andrea KO	1:48:00	Billable	Revise DOE monitoring document.
1/10/2020	Andrea KO	0:54:00	Billable	Work session with S. Packrone re: DOE monitoring document and strategize upcoming settlement conference.
1/10/2020	Andrea KO	0:24:00	Billable	Discuss compensatory education strategy with S. Packrone and M. Caiola.
1/10/2020	Michelle Caiola	0:24:00	Billable	meet with Seth and AKO to discuss terms re comp ed
1/10/2020	Seth Packrone	0:12:00	Billable	Follow up with team re: status of issues for next week's settlement conference
1/10/2020	Seth Packrone	0:54:00	Billable	Work session with AKO re: revising monitoring proposal and plan for comp ed proposal

1/10/2020	Seth Packrone	0:24:00	Billable	Strategy session with M. Caiola and AKO re: comp ed proposal
1/10/2020	Seth Packrone	0:06:00	Billable	Correspond with client re: status of case
1/13/2020	Andrea KO	0:18:00	Billable	Prep for settlement meeting with S. Packrone.
1/13/2020	Andrea KO	0:12:00	Billable	Check in with S. Packrone re: DOE monitoring proposal.
1/13/2020	Andrea KO	0:06:00	Billable	Emails with T. Borden re: DOE monitoring proposal.
1/13/2020	Michelle Caiola	0:06:00	Billable	scheduling update from SP
1/13/2020	Seth Packrone	0:18:00	Billable	Work session with aKO re: plan for tomorrow's settlement conference
1/13/2020	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: comp ed worksheet and DOE monitoring document
1/14/2020	Andrea KO	0:12:00	Billable	Finalize DOE monitoring proposal and circulate to all parties.
1/14/2020	Andrea KO	0:06:00	Billable	Review and print child find policy redline for tomorrow.
1/14/2020	Andrea KO	1:00:00	Billable	Team TC re: prep for tomorrow's settlement conference (T. Borden, S. Packrone, and R. Gorkin).
1/14/2020	Seth Packrone	0:36:00	Billable	Review DOC's latest responses to prep for settlement conference
1/14/2020	Seth Packrone	0:54:00	Billable	Team call with R. Gorkin, AKO, and T. Borden re; plan for tomorrow's settlement conference
1/14/2020	Seth Packrone	0:06:00	Billable	Tc with client, J. Oppenheim re: update on case
1/14/2020	Seth Packrone	0:12:00	Billable	Tc with T. Borden re: plan for settlement conference
1/14/2020	Seth Packrone	0:06:00	Billable	Review Defendants' latest settlement proposal
1/15/2020	Andrea KO	1:00:00	Billable	Travel from NYC to Trenton for settlement conference (2 total, bill half)
1/15/2020	Andrea KO	4:00:00	Billable	Attend settlement conference in Trenton.
1/15/2020	Andrea KO	1:00:00	Billable	Travel from Trenton to NYC after settlement conference (2 total, bill half)
1/15/2020	Seth Packrone	1:18:00	Billable	Travel to and from settlement confernece in Trenton (total was 2.6)
1/15/2020	Seth Packrone	4:00:00	Billable	Settlement conference with DOC and DOE with AKO and T. Borden
1/15/2020	Seth Packrone	0:06:00	Billable	Review DOC list of rubric edits to send to Dr. Roberts
1/16/2020	Andrea KO	0:30:00	Billable	TC with S. Packrone and T. Borden re: Plaintiffs' next steps and action items.
1/16/2020	Andrea KO	0:00:00	Billable	Draft action item email to all parties.
1/16/2020	Andrea KO	0:06:00	Billable	Review S. Packrone's edits to action item email and send to co-counsel for review.
1/16/2020	Andrea KO	0:18:00	Billable	Review S. Packrone's and T. Borden's edits to DOC policies and make further revisions.
1/16/2020	Andrea KO	0:12:00	Billable	Review T. Borden's edits to compensatory education worksheet.
1/16/2020	Andrea KO	0:12:00	Billable	Discuss further revisions to compensatory education worksheet with S. Packrone.
1/16/2020	Andrea KO	0:36:00	Billable	Further revisions to compensatory education worksheet.
1/16/2020	Seth Packrone	0:24:00	Billable	Tc with AKO and T. Borden re: next steps in settlement negotiations and edits to settlement proposal
1/16/2020	Seth Packrone	0:06:00	Billable	Check in with AKO re: edits to policies
1/16/2020	Seth Packrone	0:30:00	Billable	Edit policies to send to DOC
1/16/2020	Seth Packrone	0:12:00	Billable	Correspond with T. Borden re: edits to policies
1/16/2020	Seth Packrone	0:06:00	Billable	Review TB's edits to child find application form
1/16/2020	Seth Packrone	0:06:00	Billable	Correspond with client re: update on case
1/16/2020	Seth Packrone	0:12:00	Billable	Check in with AKO re: edits to comp ed application form
1/16/2020	Seth Packrone	0:06:00	Billable	Correspond with AKO and T. Borden re: sending policies to DOC
1/16/2020	Seth Packrone	0:06:00	Billable	Review emails with expert and with co-counsel and defendants
1/17/2020	Andrea KO	0:18:00	Billable	Strategy session with S. Packrone re: ongoing negotiations.

1/17/2020	Andrea KO	0:12:00	Billable	Run redline for S. Packrone to show edits to comp ed worksheet.
1/17/2020	Andrea KO	1:30:00	Billable	Work session with S. Packrone and T. Borden re: settlement agreement.
1/17/2020	Seth Packrone	0:18:00	Billable	Check in with AKO re: next steps for settlement agreement revisions
1/17/2020	Seth Packrone	0:42:00	Billable	Tc with AKO and T. Borden, Defendants and external monitor, Susan Roberts re: status of CAP and next steps
1/17/2020	Seth Packrone	1:36:00	Billable	Work session with T. Borden and AKO re: revisions to settlement agreemen t
1/17/2020	Seth Packrone	0:18:00	Billable	Tc with T. Zito re: release in case and comp ed system
1/21/2020	Seth Packrone	0:06:00	Billable	Correspond with team re: proposal for class member comp ed awards
1/21/2020	Seth Packrone	0:12:00	Billable	Correspond with team and Court re: call with Court today
1/21/2020	Seth Packrone	0:06:00	Billable	Follow up with team re: scheduling logistics for the call
1/21/2020	Seth Packrone	0:06:00	Billable	Tc with Court re: administrative termination of caes
1/21/2020	Seth Packrone	0:06:00	Billable	Update team re: call with court
1/21/2020	Seth Packrone	0:06:00	Billable	Follow up with T. Borden and DOE re: informing dr. Roberts about next steps in process
1/21/2020	Seth Packrone	0:12:00	Billable	Correspond with T. Borden re: release language for org plaintiffs
1/21/2020	Seth Packrone	0:06:00	Billable	Correspond with T. Zito re: release language and comp ed language
1/22/2020	Andrea KO	0:06:00	Billable	Review emails between DOE and Dr. Roberts re: Period I Verification.
1/22/2020	Seth Packrone	0:06:00	Billable	Review correspondence with Ds re: follow up with expert
1/23/2020	Andrea KO	0:06:00	Billable	Discuss next steps on our task list with S. Packrone.
1/23/2020	Andrea KO	0:30:00	Billable	Team call re: incentive award negotiation strategy and next steps for revising settlement agreement.
1/23/2020	Andrea KO	0:06:00	Billable	Follow-up discussion with S. Packrone re: incentive awards.
1/23/2020	Andrea KO	0:06:00	Billable	TC with T. Borden and S. Packrone re: incentive award negotiation strategy.
1/23/2020	Seth Packrone	0:06:00	Billable	Check in with AKO re: next steps for settlement revisions and plan for today's call
1/23/2020	Seth Packrone	0:30:00	Billable	Tc with T. Borden, Proskauer, and AKO re: next steps for settlement response
1/23/2020	Seth Packrone	0:06:00	Billable	Tc with T. Borden and AKO re: incentive award counteroffer
1/23/2020	Seth Packrone	0:06:00	Billable	Follow up strategy session with AKO re: next steps for settlement response
1/24/2020	Andrea KO	1:00:00	Billable	TC with S. Packrone and J. Oppenheimer re: update on compensatory education negotiations and consultation re: external vendors.
1/24/2020	Andrea KO	0:12:00	Billable	Discuss final edits to comp ed worksheet with S. Packrone.
1/24/2020	Andrea KO	0:06:00	Billable	Finalize comp ed worksheet and send to co-counsel for final review.
1/24/2020	Seth Packrone	1:00:00	Billable	Tc with AKO and client (Arc of NJ) re: update on settlement status and next steps
1/27/2020	Andrea KO	0:06:00	Billable	Review T. Borden's further edits to compensatory education worksheet.
1/27/2020	Andrea KO	0:12:00	Billable	Discuss edits to comp ed worksheet with S. Packrone.
1/27/2020	Andrea KO	0:18:00	Billable	Email to T. Borden re: response on comp ed worksheet edits.
1/27/2020	Seth Packrone	0:12:00	Billable	Check in with AKO re: comp ed worksheet and read emails re: same
1/28/2020	Andrea KO	0:12:00	Billable	Emails with co-counsel re: settlement agreement and release language.
1/28/2020	Seth Packrone	0:12:00	Billable	Correspond with T. Zito re: release language and comp ed language
1/28/2020	Seth Packrone	0:18:00	Billable	Revise settlement agreement and correspond with T. Borden and AKO re: same
1/28/2020	Seth Packrone	0:18:00	Billable	Review settlement redline and correspond with T. Borden re: same
1/29/2020	Andrea KO	1:42:00	Billable	Review case law re: opt-in vs opt-out classes.
1/29/2020	Andrea KO	0:06:00	Billable	Check in with S. Packrone re: upcoming action items.
1/29/2020	Andrea KO	0:30:00	Billable	Review Contra Costa County notice to class.

1/29/2020	Seth Packrone	0:06:00	Billable	Follow up on latest settlement draft with T. Borden and review what was sent to Ds
1/30/2020	Seth Packrone	0:06:00	Billable	Follow up with T. Borden re: responding to Ds
1/31/2020	Andrea KO	0:12:00	Billable	Strategy session with S. Packrone re: next steps for negotiation.
1/31/2020	Andrea KO	0:18:00	Billable	Review CAPs from DOE.
1/31/2020	Seth Packrone	0:06:00	Billable	Review correspondence with opposing counsel
1/31/2020	Seth Packrone	0:12:00	Billable	Check in with AKO re: plan for drafting notice
1/31/2020	Seth Packrone	0:06:00	Billable	Check in with T. Borden re: status of notice and outreach to opposing counsel
1/31/2020	Seth Packrone	0:06:00	Billable	Check in with AKO re: DOE CAPs
2/3/2020	Andrea KO	0:30:00	Billable	Review Period I Monitoring CAPs.
2/3/2020	Andrea KO	0:06:00	Billable	Discuss CAPs with S. Packrone.
2/3/2020	Andrea KO	0:12:00	Billable	Draft notice to class.
2/3/2020	Andrea KO	1:00:00	Billable	Draft notice to class.
2/3/2020	Seth Packrone	0:12:00	Billable	Check in with AKO re: plan for Friday's settlement conference and status of DOE CAPs
2/3/2020	Seth Packrone	0:06:00	Billable	Case planning for next steps
2/3/2020	Seth Packrone	0:12:00	Billable	Correspond with T. Borden re: plan for settlement conference
2/3/2020	Seth Packrone	0:06:00	Billable	Follow up with Defendants re: incentive payments and status of policies
2/3/2020	Seth Packrone	0:12:00	Billable	Tc with client, Arc of NJ re: status of provider list
2/4/2020	Andrea KO	0:42:00	Billable	Draft notice to class.
2/4/2020	Seth Packrone	0:30:00	Billable	Review latest round of proposals from Defendants and follow up with co-counsel re: same
2/5/2020	Andrea KO	0:12:00	Billable	Review DOC's revised policies.
2/5/2020	Andrea KO	0:30:00	Billable	Review DOE's revisions to external monitoring proposal and certification.
2/5/2020	Andrea KO	0:12:00	Billable	Review DOE's draft timeline for monitoring periods.
2/5/2020	Andrea KO	0:18:00	Billable	Emails from S. Packrone re: responses to Defendants' recent revisions.
2/5/2020	Seth Packrone	0:24:00	Billable	Prep for settlement conference
2/5/2020	Seth Packrone	0:06:00	Billable	Correspond with team re: prep for settlement conference
2/5/2020	Seth Packrone	0:24:00	Billable	Review and take notes on CAPs
2/6/2020	Andrea KO	0:06:00	Billable	Emails with co-counsel re: agenda for tomorrow.
2/6/2020	Andrea KO	0:06:00	Billable	Compile documents to prep for settlement conference tomorrow.
2/6/2020	Andrea KO	0:54:00	Billable	Finish reviewing CAPs.
2/6/2020	Seth Packrone	0:06:00	Billable	Correspond with team re: plan for settlement conference
2/6/2020	Seth Packrone	0:06:00	Billable	Check in with AKO re: follow up on DOE's CAPs
2/6/2020	Seth Packrone	0:06:00	Billable	Check in with T. Atkinson re: status of case
2/6/2020	Seth Packrone	0:06:00	Billable	Draft agenda for tomorrow's settlement conference
2/6/2020	Seth Packrone	0:06:00	Billable	Prep for settlement conference
2/6/2020	Seth Packrone	0:12:00	Billable	Check in with AKO re: plan for Friday's settlement conference
2/6/2020	Seth Packrone	1:00:00	Billable	Review CAPs to prep for tomorrow's settlement conference
2/7/2020	Andrea KO	1:00:00	Billable	Travel from NYC to Trenton for settlement conference (2.0 total, bill half)
2/7/2020	Andrea KO	3:48:00	Billable	Attended settlement conference in Trenton
2/7/2020	Andrea KO	1:00:00	Billable	Travel from Trenton to NYC after settlement conference (2.0 total, bill half)

2/7/2020	Seth Packrone	1:24:00	Billable	Travel to and from Trenton for Adam X. Settlement conference (total was 2.8, bill half)
2/7/2020	Seth Packrone	3:48:00	Billable	Settlement conference with Defendants and AKO
2/9/2020	Seth Packrone	0:06:00	Billable	Tc with M. Caiola re: status of complaint
2/10/2020	Michelle Caiola	0:06:00	Billable	updates from SP re progress on negotiation and monetary relief for names P's
2/11/2020	Andrea KO	1:18:00	Billable	Draft action item email to follow up on settlement conference.
2/11/2020	Andrea KO	0:42:00	Billable	Draft notice to class.
2/11/2020	Andrea KO	0:06:00	Billable	Discuss class definition with S. Packrone.
2/11/2020	Seth Packrone	0:06:00	Billable	Check in with AKO re: task list to send to Defendants
2/11/2020	Seth Packrone	0:12:00	Billable	Correspond with AKO re: revising task list and response to Defendants
2/11/2020	Seth Packrone	0:24:00	Billable	Draft revised class definition and follow up with AKO and T. Borden re: same
2/11/2020	Seth Packrone	0:12:00	Billable	Follow up with T. Borden re: draft of class definition
2/12/2020	Andrea KO	0:06:00	Billable	TC with S. Packrone re: site visits.
2/12/2020	Andrea KO	1:06:00	Billable	Draft notice to class.
2/12/2020	Seth Packrone	0:12:00	Billable	Correspond with T. Borden and Defendants re: class cert definition
2/13/2020	Andrea KO	0:06:00	Billable	TC with M. Caiola re: update and next steps.
2/13/2020	Michelle Caiola	0:06:00	Billable	next steps re prison visits with AKO
2/13/2020	Seth Packrone	0:18:00	Billable	Correspond with T. Borden and Defendants re: issues and client visits
2/13/2020	Seth Packrone	0:06:00	Billable	Check in with AKO re: next steps
2/13/2020	Seth Packrone	0:06:00	Billable	Follow up with T. Borden re: client visits
2/14/2020	Andrea KO	0:12:00	Billable	Emails with co-counsel re: setting up upcoming prison visits.
2/14/2020	Andrea KO	0:06:00	Billable	Check in with S. Packrone re: notice and child find.
2/14/2020	Andrea KO	0:06:00	Billable	Emails with co-counsel re: child find policy.
2/14/2020	Andrea KO	0:12:00	Billable	Review memo from client re: vendor list.
2/14/2020	Andrea KO	0:12:00	Billable	Draft letter to client re: adding me to attorney list.
2/14/2020	Andrea KO	0:30:00	Billable	Research applicability of CAFA to federal question cases.
2/14/2020	Seth Packrone	0:06:00	Billable	Check in with team re: visits
2/18/2020	Andrea KO	0:06:00	Billable	Strategy session with S. Packrone re: compensatory education worksheet.
2/18/2020	Andrea KO	0:24:00	Billable	TC with S. Packrone and T. Borden re: compensatory education worksheet.
2/18/2020	Andrea KO	0:06:00	Billable	Follow-up TC with S. Packrone re: next steps.
2/18/2020	Seth Packrone	0:06:00	Billable	Case planning for next steps in settlement negotiations
2/18/2020	Seth Packrone	0:06:00	Billable	Correspond with T. Borden re: next steps for comp ed form
2/18/2020	Seth Packrone	0:06:00	Billable	Correspond with AKO re: comp ed worksheet
2/18/2020	Seth Packrone	0:18:00	Billable	Tc with AKO and T. Borden re: comp ed worksheet
2/19/2020	Andrea KO	0:06:00	Billable	Review email from M. Vomacka re: DVR list.
2/19/2020	Andrea KO	0:06:00	Billable	Emails with co-counsel re: coordinate child support lien searches.
2/19/2020	Andrea KO	0:06:00	Billable	Review co-counsel's edits to compensatory education worksheet.
2/19/2020	Seth Packrone	0:06:00	Billable	Follow up with AKO re: comp ed draft
2/20/2020	Andrea KO	0:12:00	Billable	Review vendor list memo from client.
2/20/2020	Andrea KO	0:06:00	Billable	Emails with opposing counsel re: delay of action items.

2/20/2020	Andrea KO	0:18:00	Billable	Review S. Packrone's edits to notice to class members.
2/20/2020	Andrea KO	1:00:00	Billable	Strategy session with S. Packrone re: comp ed worksheet, notice, case files, and next steps.
2/20/2020	Andrea KO	0:12:00	Billable	TC with S. Packrone and J. Oppenheimer re: update.
2/20/2020	Andrea KO	0:18:00	Billable	Team call re: settlement updates and strategy.
2/20/2020	Andrea KO	0:18:00	Billable	Finalize comp ed worksheet and send to co-counsel.
2/20/2020	Andrea KO	0:12:00	Billable	Review DOC's email re: class definition edits and discuss same with S. Packrone.
2/20/2020	Seth Packrone	0:24:00	Billable	Review/revise notice from AKO and send back comments to AKO
2/20/2020	Seth Packrone	0:06:00	Billable	Review emails with co-counsel
2/20/2020	Seth Packrone	0:06:00	Billable	Prep materials for AKO's review
2/20/2020	Seth Packrone	0:48:00	Billable	Work session with AKO re: outstanding items for settlement
2/20/2020	Seth Packrone	0:12:00	Billable	Tc with AKO and client, Arc of NJ re: update on settlement status
2/20/2020	Seth Packrone	0:18:00	Billable	Tc with team with AKO re: next steps for settlement negotiations
2/20/2020	Seth Packrone	0:06:00	Billable	Follow up strategy session with aKO re: next steps for case
2/20/2020	Seth Packrone	0:12:00	Billable	Correspond with T. Borden re: class definition issues and follow up with AKO re: same
2/21/2020	Andrea KO	0:18:00	Billable	Begin drafting pro hac vice motion and instructions to S. Feldman re: same.
2/21/2020	Andrea KO	0:06:00	Billable	Discuss comp ed worksheet with S. Packrone.
2/21/2020	Andrea KO	0:06:00	Billable	TC with T. Borden re: final edits to comp ed worksheet.
2/21/2020	Seth Packrone	0:06:00	Billable	Follow up with team re: next steps
2/21/2020	Seth Packrone	0:06:00	Billable	Review emails with team
2/21/2020	Seth Packrone	0:06:00	Billable	Check in with AKO re: plan for next week
2/24/2020	Andrea KO	0:06:00	Billable	Emails with S. Packrone and T. Borden re: call with client.
2/24/2020	Andrea KO	0:06:00	Billable	Emails with opposing counsel re: revisions to class definition.
2/24/2020	Andrea KO	0:12:00	Billable	Attempt to call client; await prison administration's response with T. Borden and S. Packrone.
2/24/2020	Andrea KO	0:24:00	Billable	TC with T. Borden, S. Packrone, and client re: update to case, settlement offers, staffing changes.
2/24/2020	Andrea KO	0:24:00	Billable	TC with DOC and DOE re: class definition and other updates prior to settlement conference.
2/24/2020	Andrea KO	0:06:00	Billable	Emails with T. Borden and S. Packrone re: upcoming client meetings.
2/24/2020	Andrea KO	0:24:00	Billable	Revise notice to class members.
2/24/2020	Seth Packrone	0:06:00	Billable	Correspond with team re: plan for call
2/24/2020	Seth Packrone	0:36:00	Billable	Tc with client, AKO, and T. Borden re: update
2/24/2020	Seth Packrone	0:24:00	Billable	Tc with Defendants re: plan for class definition
2/25/2020	Andrea KO	0:06:00	Billable	Emails with co-counsel re: DOC's settlement agreement revisions.
2/25/2020	Andrea KO	0:18:00	Billable	Check in with S. Packrone re: upcoming client visits and transitioning client contact.
2/25/2020	Andrea KO	0:12:00	Billable	Emails from DOC re: class definition.
2/25/2020	Seth Packrone	0:06:00	Billable	Follow up with team re: plan for tomorrow
2/25/2020	Seth Packrone	0:06:00	Billable	Prep for tomorrow's settlement conference
2/25/2020	Seth Packrone	0:06:00	Billable	Check in with AKO re: status of settlement draft
2/26/2020	Andrea KO	1:00:00	Billable	Travel from NYC to DOC facility to meet with client (total was 2.0, bill half).
2/26/2020	Andrea KO	1:18:00	Billable	Meet with client at DOC facility (includes time spent waiting for DOC officers to bring client to meeting room).
2/26/2020	Andrea KO	0:06:00	Billable	Travel from DOC facility to court for settlement conference.

2/26/2020	Andrea KO	3:30:00	Billable	Attend settlement conference (total was .2, bill half).
2/26/2020	Andrea KO	0:36:00	Billable	Travel from settlement conference to DOC facility to meet with client (total was 1.2, bill half).
2/26/2020	Andrea KO	0:54:00	Billable	Meet with client at DOC facility.
2/26/2020	Andrea KO	1:06:00	Billable	Travel from DOC facility to NYC after client visit (total was 2.2, bill half).
2/26/2020	Seth Packrone	1:54:00	Billable	Travel to visit clients (at two DOC facilities), court for settlement conference, and back home (total was 3.9, bill half)
2/26/2020	Seth Packrone	3:30:00	Billable	Settlement conference with AKO, T. Borden, and Defendants
2/26/2020	Seth Packrone	1:18:00	Billable	Meet with client at prison and update him on case with AKO and T. Borden
2/26/2020	Seth Packrone	0:54:00	Billable	Meet with second client at prison
2/26/2020	Seth Packrone	0:06:00	Billable	Update M. Caiola re: status of case
2/27/2020	Andrea KO	0:30:00	Billable	Instructions to S. Feldman re: PHV motion documents and review drafts of same.
2/27/2020	Andrea KO	0:06:00	Billable	Emails with co-counsel and Dr. Roberts re: scheduling upcoming call.
2/27/2020	Andrea KO	1:00:00	Billable	Team meeting with S. Packrone and R. Rodgers re: transition.
2/27/2020	Seth Packrone	1:00:00	Billable	Strategy session with R. Rodgers and AKO re: next steps for case
2/27/2020	Seth Packrone	0:30:00	Billable	Expand exit memo
2/28/2020	Andrea KO	0:06:00	Billable	Review S. Packrone's exit memo re: transitioning case.
2/28/2020	Andrea KO	0:18:00	Billable	Review email from M. Vomacka re: lien searches; discuss same with S. Packrone, T. Borden, and R. Rodgers.
3/2/2020	Andrea KO	0:06:00	Billable	Instructions to S. Feldman re: CAP spot-check and pro hac vice payment paperwork.
3/2/2020	Andrea KO	0:24:00	Billable	Emails with co-counsel re: task list.
3/2/2020	Andrea KO	0:06:00	Billable	Circulate calendar invite for work session.
3/3/2020	Andrea KO	0:30:00	Billable	Analyze Third Circuit caselaw and procedures re: preliminary approval.
3/3/2020	Andrea KO	0:06:00	Billable	Review emails from DOC re: liens.
3/3/2020	Andrea KO	0:48:00	Billable	Review motion for preliminary approval exemplars.
3/3/2020	Andrea KO	0:06:00	Billable	TC with T. Borden re: DOC liens.
3/3/2020	Andrea KO	0:12:00	Billable	Update to R. Rodgers re: attorney fee negotiation strategy, settlement agreement draft, and preliminary approval.
3/4/2020	Andrea KO	0:12:00	Billable	Save lien information to server.
3/4/2020	Andrea KO	1:00:00	Billable	TC/work session with T. Borden re: settlement agreement and motion for preliminary approval.
3/4/2020	Andrea KO	0:12:00	Billable	TC with T. Borden re: public defender liens.
3/5/2020	Andrea KO	1:12:00	Billable	Review updated settlement agreement draft with co-counsel's additional edits.
3/5/2020	Andrea KO	0:36:00	Billable	Review email and revisions from DOC re: rubrics.
3/5/2020	Andrea KO	0:12:00	Billable	Emails with co-counsel re: DOC's revisions to rubrics.
3/5/2020	Andrea KO	0:12:00	Billable	TC with T. Borden re: DOC's revisions to rubrics.
3/6/2020	Andrea KO	0:54:00	Billable	Finalize edits to settlement agreement and send to R. Rodgers for review.
3/9/2020	Andrea KO	0:12:00	Billable	Review email from DOC re: revised policies.
3/9/2020	Andrea KO	0:06:00	Billable	TC with T. Borden re: DOC revised policies.
3/9/2020	Andrea KO	0:18:00	Billable	TC with DOC and T. Borden re: revised policies and rubrics.
3/9/2020	Andrea KO	0:12:00	Billable	Follow-up TC with T. Borden re: revised policies and settlement agreement next steps.
3/9/2020	Andrea KO	0:06:00	Billable	Check in with R. Rodgers re: draft policies, whether to attach as exhibits.
3/9/2020	Andrea KO	1:12:00	Billable	Draft motion for preliminary approval outline.
3/9/2020	Andrea KO	0:18:00	Billable	Review Contra Costa motion for preliminary approval.

3/10/2020	Andrea KO	0:06:00	Billable	Update to M. Caiola re: next steps.
3/10/2020	Andrea KO	0:12:00	Billable	Emails with co-counsel re: revisions to settlement agreement.
3/10/2020	Michelle Caiola	0:18:00	Billable	status update from AKO, plan for next steps
3/11/2020	Andrea KO	0:18:00	Billable	Prep for Adam X. call, review action item task list, etc.
3/11/2020	Andrea KO	0:30:00	Billable	Review DOC policies
3/11/2020	Andrea KO	1:24:00	Billable	Adam X. Telephonic settlement conference
3/11/2020	Andrea KO	0:36:00	Billable	TC with T. Borden re: class definition, MPA
3/11/2020	Andrea KO	0:12:00	Billable	Email to R. Rodgers re: class definition
3/11/2020	Andrea KO	0:30:00	Billable	Revise transition services policy and send email to DOC re: comp ed worksheet and policies for Dr. Roberts
3/11/2020	Andrea KO	0:12:00	Billable	Review email from DOC re: draft email to Dr. Roberts.
3/11/2020	Andrea KO	0:06:00	Billable	Email to S. Feldman re: pro hac vice payment.
3/11/2020	Andrea KO	0:18:00	Billable	Further emails with co-counsel re: class definition.
3/11/2020	Andrea KO	0:24:00	Billable	TC with T. Borden re: class definition.
3/12/2020	Andrea KO	0:06:00	Billable	Discuss settlement agreement with R. Rodgers.
3/12/2020	Andrea KO	0:18:00	Billable	TC with DOC and DOE re: class definition.
3/12/2020	Andrea KO	0:36:00	Billable	TC with all counsel and Dr. Roberts.
3/12/2020	Andrea KO	0:06:00	Billable	Follow-up TC with R. Rodgers re: compensatory education.
3/12/2020	Andrea KO	0:18:00	Billable	TC with T. Borden re: settlement agreement and motion for preliminary approval.
3/12/2020	Andrea KO	0:06:00	Billable	Emails with co-counsel re: pro hac vice payment.
3/17/2020	Andrea KO	0:06:00	Billable	Emails with T. Borden re: plan for tomorrow's settlement call.
3/18/2020	Andrea KO	0:18:00	Billable	Review email from DOC re: update on settlement positions.
3/18/2020	Andrea KO	0:36:00	Billable	Telephonic settlement call.
3/18/2020	Andrea KO	0:06:00	Billable	Review DOE's draft expert certification.
3/19/2020	Andrea KO	0:36:00	Billable	Review S. Feldman's findings re: CAP discrepancies.
3/23/2020	Andrea KO	0:06:00	Billable	Review news update from DOC re: NJ prison teachers working from home.
3/23/2020	Andrea KO	0:06:00	Billable	Emails with all parties re: attendance at upcoming settlement conference.
3/23/2020	Andrea KO	0:06:00	Billable	Review standing order re: COVID-19.
3/23/2020	Andrea KO	0:06:00	Billable	Update R. Rodgers on settlement status.
3/24/2020	Andrea KO	0:06:00	Billable	Review attorney fee summary.
3/24/2020	Andrea KO	0:24:00	Billable	Email to DOE re: CAP discrepancies.
3/25/2020	Andrea KO	0:12:00	Billable	Review research re: attorney's fees and rates in DNJ.
3/25/2020	Andrea KO	0:06:00	Billable	Update M. Caiola re: status of negotiations, timeline.
3/25/2020	Andrea KO	0:12:00	Billable	TC check-in with T. Borden re: prep for settlement call.
3/25/2020	Andrea KO	0:24:00	Billable	TC with all counsel and Judge Goodman re: update on settlement negotiations.
3/25/2020	Andrea KO	0:24:00	Billable	Follow-up call with DOC and DOE re: scheduling next steps.
3/25/2020	Andrea KO	0:06:00	Billable	Emails with T. Borden re: update to the Court.
3/25/2020	Michelle Caiola	0:06:00	Billable	update from AKO re negotiations
3/26/2020	Andrea KO	0:12:00	Billable	Discuss fee negotiation with R. Rodgers.
3/26/2020	Andrea KO	1:06:00	Billable	Review DOC's revisions to rubrics.

3/27/2020	Andrea KO	0:36:00	Billable	Draft email response to DOC re: rubrics.
3/27/2020	Andrea KO	0:12:00	Billable	Follow-up emails with DOC re: rubrics.
3/30/2020	Andrea KO	0:42:00	Billable	Review co-counsel's revisions to notice and revise accordingly.
3/30/2020	Andrea KO	0:12:00	Billable	Emails with co-counsel re: notice to class.
3/31/2020	Andrea KO	0:24:00	Billable	Outline class certification section of motion for preliminary approval.
		1886:54:00		